



**DCPS GRADUATION REVIEW
SY 2016-2017 AUDIT AND INVESTIGATION**



**Final Report
District of Columbia Public Schools
Audit and Investigation**

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CONTAINS SENSITIVE INFORMATION

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I. EXECUTIVE SUMMARY

A. Introduction

In late November 2017, a series of stories were released in local media outlets alleging that Ballou High School (“Ballou”) in Southeast Washington, DC had improperly graduated many students. Specific allegations made in the coverage included that teachers had been pressured to award higher grades to students, that credit recovery was being improperly used, and that graduates had passed courses despite extreme levels of absenteeism.

Alvarez & Marsal (“A&M”) was engaged by the Office of the State Superintendent of Education (“OSSE”) to conduct an audit and investigation to examine policy adherence and supporting grade and graduation data in District of Columbia Public Schools (“DCPS”) high schools, with a specific focus on Ballou. The Statement of Work includes a review of the records for the entire class of 2017 at Ballou as well as representative samples of students of the other 18 DCPS high schools that submitted graduation data to OSSE in school year 2016-2017 (“SY16-17”).

A&M’s investigation included reviewing policies and procedures, conducting interviews with key staff, analyzing data and reviewing student records for SY16-17 to present a report detailing the extent of policy and regulation violations, and their potential contribution to graduation rates. During the course of the investigation, A&M has also documented other findings and observations related to grading, attendance, and credit recovery.

A&M’s Interim Report, submitted on January 12th, 2018 included detailed findings on Ballou. **This Final Report reflects a system-wide audit and investigation of high schools DCPS-wide. Data analysis presented within this report covers all 2017 DCPS graduates.**

B. Allegations

Initial media coverage and A&M’s subsequent interviews with current and former DCPS staff identified key allegations regarding potential policy violations at high schools across DCPS. Reports included claims that students were graduating despite being unprepared, with some students so far below standards that they are unable to read or write. Reports made specific allegations which centered on students who did not meet standards in compliance with DCPS and District of Columbia Municipal Regulations (“DCMR”) requirements. Specific allegations included:

- Students passed courses with excessive unexcused absences in violation of DCPS policy.
- Administrators applied pressure to pass chronically-absent students and to give them make-up work or extra credit which did not align with the provisions of the SY15-16 DCPS Secondary School Grading and Reporting Policy (“Grading Policy”).

- Ballou had an unofficial policy under which it granted students 50 percent credit on assignments that they missed or did not complete.
- The school engaged in inappropriate or excessive use of credit recovery, including allowing students who had not yet failed courses to take credit recovery for original credit.
- Teachers received poor evaluations, which resulted in or could result in job dismissal, for failing to implement the administration's practices.

C. Findings

The table below summarizes A&M's key system-wide findings from this audit and investigation. Findings for individual schools are included in Appendix A: School Summaries.

Finding	Description
Credit Recovery is Misused at Most DCPS High Schools, Often Violating DCPS Policies and DCMR.	<p>Most DCPS schools violated credit recovery program requirements, by:</p> <ol style="list-style-type: none"> 1) Offering credit recovery courses to students who had not yet failed a regular instruction course (i.e. credit recover offered concurrently or in place of regular instruction). 2) Awarding credit for courses which do not meet 120 seat hour requirement under the Carnegie Unit definition in 5-A DCMR § 2299.1 ("seat hour"). 3) Failing to enforce attendance requirements in credit recovery courses 4) Creating school-developed credit recovery programs that do not comply with the Evening Credit Recovery Operations Manual ("ECR Manual").
Attendance-Related Grading Policies are Rarely Followed Across DCPS	<p>At most DCPS high schools, students have been allowed to pass courses despite excessive unexcused absences, at times missing the majority of the course. Grade reductions and failures due to absences are rarely enforced by DCPS high school teachers or administrators.</p>
Lack of Support and Oversight from DCPS Policy Violations Across High Schools	<p>A lack of support and oversight from DCPS Central Office contributed significantly to policy violations system-wide related to grading, credit recovery, excessive absences, and graduation of ineligible students. Specifically, training, communication, tools, and monitoring were inadequate.</p>
Most DCPS High Schools Exhibited a Culture of Passing and Graduating Students	<p>DCPS teachers and school leaders are subject to a variety of institutional and administrative pressures which have contributed to a culture in which passing and graduating students is expected, sometimes in contradiction to standards of academic rigor and integrity. Pressures contributing to this culture included:</p> <ol style="list-style-type: none"> 1) Empathy for the extreme needs of the DCPS student population (high poverty, English language learners, and special education) 2) Aggressive graduation and promotion goals 3) Increasingly burdensome documentation required to fail students

A&M's review identified that of the **2,758 SY16-17 DCPS graduates, 937 (34.0%) students graduated with the assistance of policy violations**. These policy violations were found at all but two schools and occurred with greater frequency in schools that serve larger percentages of high need students (i.e., high poverty, English language learners, special education students). Figure 1 below summarizes the findings for the entire district. For a summary of school specific findings, see Figure 15.

Graduations Impacted by Policy Violations in SY16-17		
	Count of Students*	% of Graduates
Total Number of Graduates	2,758	
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	572	20.7%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	423	15.3%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	34	1.2%
Credit Recovery Earned as an Original Credit	411	14.9%
Credit Recovery Earned Taken Concurrently with Original Credit Course	36	1.3%
Total Graduations Impacted by Policy Violations	937	34.0%
Total Graduations Not Impacted by Policy Violations	1,821	66.0%

**Count of students is not unique. Graduates may have more than one policy violation, so these counts cannot be summed. Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 1: Graduations Impacted by Policy Violations in SY16-17

To demonstrate the degree to which individual students are affected by multiple policy violations, and to account for the overlap between issues identified in this report, Figure 2, below summarizes the number of students affected by multiple policy violations.

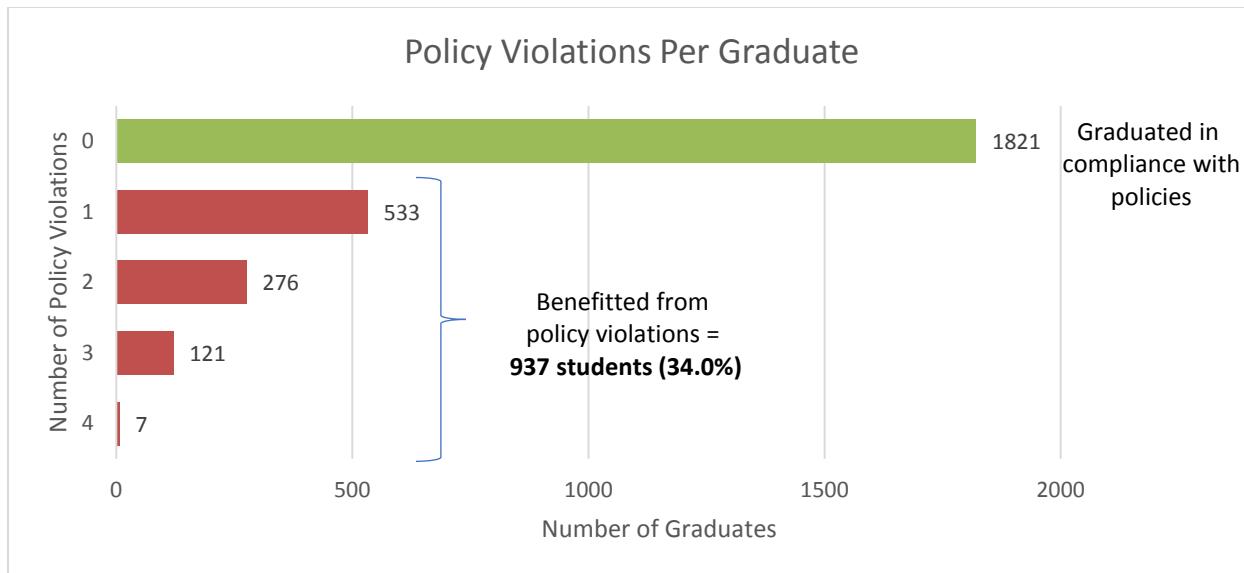


Figure 2: Total Policy Violations Per Graduate

In addition to the data analysis A&M performed on all 2017 graduates, A&M reviewed a random sample of 617 transcripts to identify students who were missing credit for required coursework. This included a sample of at least 20% of 2017 graduates at each DCPS high school. A&M identified that **of 617 students in the sample, 13 (2.1%) students were missing credits in courses required to earn a DC Diploma**. This was found at six schools. The results of this analysis are presented within Figure 3 as a percentage of the sample.

As transcript review was performed on just a sample of students, Figure 2 above, does not include these identified policy violations.

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	617	
Missing Required Coursework	13	2.1%

Figure 3: Sampled Graduates Missing Required Coursework

This number is in addition to the results of the Ballou investigation. A&M identified that of 177 SY16-17 Ballou graduates, three students were missing credits in courses required to earn a DC Diploma.

D. Recommendations

The table below summarizes A&M's key system-wide findings from this audit and investigation. Recommendations for individual schools are included in Appendix A: School Summaries.

Recommendation	Description
Improve DCPS Central Office Oversight and Enhance Accountability at High Schools	<p>Improve accountability and oversight to ensure schools fully comply with all relevant regulations and policies by implementing the following practices:</p> <ol style="list-style-type: none"> 1) Assign individual accountability for policy adherence to all staff 2) Strengthen centralized analysis and monitoring 3) Improve audit function to include academic integrity and policy adherence
Provide Additional Support to Improve the Consistency and Accountability of Credit Recovery at DCPS High Schools	<p>Make significant investments to support credit recovery programs at schools, and provide additional oversight and accountability through the following:</p> <ol style="list-style-type: none"> 1) Increase the number of staff in the Central Office credit recovery team and empower the team with the appropriate authority to oversee credit recovery at all DCPS high schools. 2) Enhance systems and supports to improve consistency and accountability, and to strengthen compliance with program requirements. 3) Reconcile credit recovery programs with the 120 seat hour requirement. 4) Perform regular eligibility, enrollment, and curriculum audits for credit recovery programs.
Improve Policies and Procedures Governing Attendance, Grading, Credit Recovery, and Graduation Certification	<p>Enhance policies and procedures to improve consistency, accountability, and compliance with DCMR:</p> <ol style="list-style-type: none"> 1) Improve Grading Policy to eliminate any contradictions, include all DCMR requirements, and clarify accountability for policy adherence. 2) Expand upon and formalize ECR Manual into an official DCPS policy to add structure to all credit recovery programs, and include clear requirements which reduce risk of error, misinterpretation, or misuse. 3) Update graduation certification process to eliminate inappropriate issuance of diplomas.
Enhance Systems and Supports to Improve Consistency and Accountability	<p>Make system improvements to enhance oversight and monitoring capabilities, including the following:</p> <ol style="list-style-type: none"> 1) Enhance attendance/grading reporting capabilities 2) Improve audit trails and controls over Aspen system access 3) Integrate suspension data into period-level attendance in Aspen 4) Improve graduation certification process by ensuring that, as a complement to the automated process, schools manually verify that transcripts meet graduation requirements 5) Standardize Aspen configuration across schools to facilitate DCPS' ability to provide oversight and monitoring across the school system

- | | |
|--|---|
| | 6) Centralize cohort management function within Central Office to locate students who have dropped out or transferred from DCPS schools |
|--|---|

E. Other Areas for Investigation

During the course of A&M's review, current and former DCPS employees at several schools expressed concern that attendance records had been manipulated in order to improve reported attendance. A&M investigated these claims by analyzing the total number of period attendance record changes from absent to present, and identified extreme irregularities at one DCPS high school. Dunbar High School exhibited excessive modifications to teacher-entered attendance records. This finding, aligning with staff reports of attendance manipulation, requires further investigation and is discussed in greater detail in the Other Findings and Observations section of this report.

II. DCPS POLICIES AND PROCEDURES REVIEW

A. Introduction

In order to appropriately assess policy and procedure adherence, and in compliance with the Statement of Work, A&M conducted a thorough review of the key policies and procedures related to the attendance, grading, promotion, and graduation certification. A&M conducted a review of legal, regulatory requirements, an assessment of individual policies and procedures, and an assessment of DCPS's adherence to established requirements. This policy and procedures review serves several key purposes:

1. Establish a baseline of the requirements DCPS personnel must adhere to, informing investigative activities, and allowing A&M to identify potential wrong-doing;
2. Assess DCPS's implementation of procedures to identify gaps in awareness and adherence, and recommend opportunities to improve communication, controls, and reporting to mitigate any identified risks: and
3. Identify areas for improvement in DCPS policies and procedures to address any lack of clarity surrounding proper implementation of policies in accordance with DCMR and other relevant requirements.

B. Approach

In accordance with the Statement of Work, A&M conducted a review of the relevant laws, regulations, policies and procedures which govern DCPS's attendance, grading, and use of credit recovery:

- **State Code:** Title 38 (Educational Institutions) of the DC Code outlines requirements for the State Board of Education and DCPS, including provisions related to attendance, promotion, and graduation which have potential impacts on graduation reporting by DCPS.
- **State Regulations:** DCMR establishes the practical rules which Local Education Agencies (LEAs) are required to follow to maintain compliance with legislation. A&M reviewed the relevant regulations included in DCMR Title 5.
- **DCPS Policies and Procedures:** DCPS's own policies and procedures provide a critical framework for appropriately supporting students in accordance with State Law and Regulations. A&M identified each set of requirements which had the potential to impact graduation rates directly or indirectly. A&M's review of policies and procedures focused on the grading implications of the attendance policy, and included a review of related policies and procedures. These included policies and procedures related to attendance, grading, credit recovery, and promotion and certification for graduation.

C. Review of DCPS Policies and Procedures

The following section outlines key observations and recommendations related to policies and procedures at DCPS. The recommendations below can improve consistency and accountability related to the issues

identified in this audit and investigation, however, A&M recommends that any major policy changes be developed collaboratively with DCPS stakeholders, and be analyzed carefully for any potential unintended consequences.

1. Attendance

Washington DC Code and DCMR require school attendance until the age of 18. Educational institutions are required to track student attendance, notify truant students and their parents on a set schedule, and escalate truancy issues appropriately through the court system. The calculation of “present” for this reporting is defined by 5-A DCMR §2199.1, which considers a student absent if he or she misses 20 percent of the day.

Starting with five unexcused absences, students’ grades are expected be lowered while more than 30 unexcused absences within a school year results in failure of the relevant courses and retention in the current grade level.

a) Observations and Recommendations

Area	Observations	Recommendations
Overall Policies and Procedures	<p>In accordance with 5-E DCMR §2103.7-10, Grading Policy stipulates that students with more than five unexcused absences per advisory (i.e., term or quarter) shall receive a grade reduction, more than 10 unexcused absences per advisory shall result in a failure due to absences, and more than 30 unexcused absences for the year shall result in a failing grade and loss of credit for the course.</p> <p>This policy does not specify the magnitude of the grade reduction to be given for five or more unexcused absences in an advisory.</p>	<p>Clarify the magnitude of the grade reduction to be received for students with five or more unexcused absences in an advisory.</p>
	<p>Grading Policy does not clearly outline the grade reduction and failure due to absence standards for partial-year courses or courses with alternative schedules, half credit courses, and block scheduled courses which meet fewer times relative to the standard course. Unclear requirements may permit higher levels of absences in these courses relative to the number of total class meetings.</p>	<p>Specify the number of days a student can miss for a half-credit course before failing due to absence or consider an attendance related Grading Policy which scales based on the number of class meetings (e.g. failure for unexcused absences in greater than 20% of class meetings).</p>

	Attendance-related grading requirements for alternative education programs, such as credit recovery and Summer School are not clearly specified in Grading Policy.	Establish clear and consistent policies for excessive absences and grading for all DCPS coursework, and include these expectations in Grading Policy.
Communications and Training	Attendance policies and procedures are found in the DCPS Parent Handbook and the DCPS Grading Policy on the DCPS website. However, initial rollout of this policy was not properly supported by training for teachers, and summary documentation distributed by the Office of the Chief of Schools did not include reference to the attendance-related grading policy.	Support introduction of new policies or modifications to existing policies with a comprehensive training program led by Central Office. Regularly communicate attendance and attendance-related grading policies to teachers, parents and students, emphasizing the importance of attendance and the consequences of absences in class.
Systems and Technology	Attendance and grading are not linked in Aspen in a way that facilitates reporting of excessive unexcused absences relative to grading. This increases the burden of complying with DCPS Grading Policy by limiting DCPS's ability to monitor grades and grading adjustments for students with excessive unexcused absences.	In the short term, provide consolidated analysis to identify students with passing grades and excessive unexcused absences, and support school leaders in making appropriate adjustments. Work to configure Aspen to support automated grading adjustments due to excessive absences in accordance with DCPS policies.
	Teachers have limited visibility into the excused/unexcused status of absent students in Aspen and are unable to easily verify absences which should or should not impact grades, including suspensions.	Improve tools to enhance visibility into excused and unexcused absences.
Monitoring and Accountability	The DCPS Central Attendance Office has significant visibility into attendance, truancy rates, and students who need intervention. DCPS uses this information to identify barriers to attendance, target attendance initiatives, follow up with school action for truant students, and monitor compliance rates with reporting requirements. However, DCPS has not used this data to monitor adherence to grading policies.	Develop a monitoring function within the Office of Accountability which performs data analysis to monitor for Grading Policy compliance. Utilize reporting to hold school leaders and teachers accountable to the attendance-related grading policy.

2. *Grading*

DCPS's Grading Policy outlines requirements for teachers and school leaders which support adherence to DCMR requirements. The Grading Policy as written includes some of the attendance-related grading sanctions noted in the section above and also identifies expectations for timely grade entry and appropriate supports for struggling students. The Grading Policy is the basis for documentation requirements which have in many schools created a high administrative burden to fail students, and contributed to pressure on teachers to pass excessively absent students. These challenges are outlined within A&M's key finding "Most DCPS high schools exhibit a culture of passing." This section discusses specific weaknesses of the Grading Policy, and identifies recommendations to improve the policy and DCPS's adherence.

a) Observations and Recommendations

Area	Observations	Recommendations
Overall Policies and Procedures	<p>The Grading Policy is not specific as to the types of make-up work which are appropriate. In some cases, this lack of definition has allowed teachers to provide students excessive credit for last minute make-up work which does not reflect the rigor of the regular instruction course.</p> <p>The Grading Policy includes three contradictory statements related to make-up work:</p> <ul style="list-style-type: none"> • "Students typically have three days to complete make-up work whether the absence was excused or not." • "Each teacher shall specify a reasonable period of time for completion of make-up work, which shall be no less than one full calendar day for each day missed." • "Unless special arrangements have been made, students have one day for each day missed (up to one week) from the last day of the absence to submit make up work." <p>Unclear make-up work timelines allow interpretations which are not consistent with the intent of the policy.</p>	<p>Outline all appropriate circumstances where teachers may offer make-up work in order to reduce unintended usage. Specify maximum impact that make-up work may have on grades.</p> <p>Define clear timelines around the completion of make-up work relative to the date of the missed assignment and in relation to the end of the quarter or school year to avoid misinterpretation.</p>

	<p>The Grading Policy requires that opportunities be given to struggling students but does not specify whether this applies to excessively absent students. For example, "All students should be given the opportunity to earn a passing grade after progress reports are issued, even if they are failing when they receive their progress report. This should not be construed to mean students should receive unearned passing grades." This lack of clarity contributes to teachers offering opportunities inconsistent with the attendance-related Grading Policy.</p>	<p>The Grading Policy should be amended to include language that states that a student should be allowed to earn a passing grade provided they have not failed due to absence.</p>
Overall Policies and Procedures	<p>The Grading Policy only indicates that the primary responsibility for evaluating the work of the student shall rest with the teacher. Some teachers have interpreted this to mean they have complete autonomy over grading decisions.</p>	<p>Clarify that teachers have the responsibility to evaluate student work in compliance with the Grading Policy.</p>
	<p>Many schools have implemented their own versions of the grade change form, leading to inconsistent application of policies.</p>	<p>Design a standard grade change form with all required elements to avoid any errors or misinterpretations that might arise from disparate school designed forms.</p>
	<p>The Grading Policy does not establish procedures for grading in cases of teacher vacancy. This can allow administrators to assign grades inconsistent with the Grading Policy.</p>	<p>Clarify the requirements for grade entry in cases of teacher vacancy, including appropriate accountability for administrator entry of grades.</p>
	<p>Rollout of the DCPS Grading Policy was not supported with comprehensive training. Additionally, limited guidance on the DCPS Grading Policy and proper usage is provided to teachers during the onboarding process.</p>	<p>Develop and deploy a comprehensive training program related to grading policies as part of the orientation and onboarding process and offer recurring trainings before each school year starts to keep experienced teachers familiar with policy.</p>
Communications and Training	<p>The "M" grade has been inconsistently used across DCPS high schools, sometimes as "Medical" and in other cases "Missing." This has resulted in some grades being omitted from the student's final grades when there may not have been a medical issue present.</p>	<p>Provide staff with appropriate tools and training on grade codes within the Aspen system, and ensure that proper checks are in place to prevent misuse of the "M" code.</p>

Systems and Technology	Teachers have limited visibility into the final grade calculation process, limiting their ability to advise students on the necessary performance to pass courses.	Clarify the Aspen grade calculation process with teachers to allow them to have insight as to how their final grades will be calculated.
Monitoring and Accountability	DCPS does not monitor student grades against unexcused absences, instead relying on teachers to lower grades in response to absences.	Analyze absence data alongside grading data to ensure that absences are being appropriately associated with grade impacts. Pursue automation of appropriate grading adjustments.
	Grading deadlines are not consistently enforced system-wide. School adjustments to grading timelines can allow grade changes outside of compliance with policy with no audit log.	Enforce system-wide deadlines for grade entry with no exceptions.

3. Credit Recovery

Credit recovery courses are a useful tool to allow students another chance to complete assignments and relearn materials. However, poorly regulated credit recovery programs are a potential pathway to grade manipulation and can affect the graduation rates of individual schools and the district as a whole.

a) Observations and Recommendations

Area	Observations	Recommendations
Overall Policies and Procedures	DCPS has no comprehensive policy to address non-traditional programming, including the many variations of credit recovery.	<p>Develop a credit recovery policy manual to encompass all non-traditional programming within DCPS that specifies:</p> <ul style="list-style-type: none"> • Attendance requirements • Grading requirements for credit recovery courses • Seat hour requirements • Eligibility requirements • Curriculum requirements • Appropriate use of technology
	DC Code and DCMR do not outline any rules that govern the operation of credit recovery programs.	<p>Develop comprehensive requirements for the operation of credit recovery programs, including:</p> <ul style="list-style-type: none"> • Eligibility requirements • Attendance requirements • Rigor of coursework

		<ul style="list-style-type: none"> • Limitations on use
	DCPS requirements do not clearly outline requirements for varying school-level credit recovery programs (including Twilight and daytime credit recovery) to meet the 120-seat hour requirement.	Update credit recovery policy to require all offered credit recovery courses to meet the 120-seat hour requirement, and include requirements for compliance monitoring.
Systems and Technology	Web-based systems such as Edgenuity can be used to provide consistent and standardized programming and evaluation in credit recovery courses, but are not consistently used to do so.	Encourage consistent use of technology solutions to standardize curriculum and evaluation in credit recovery courses.
Monitoring and Accountability	The credit recovery handbook specifies requirements for the operation of credit recovery courses, however there are a variety of school-level variations from DCPS guidance. Central Office provides limited tools and staffing to ensure compliance with credit recovery requirements.	<p>Provide sufficient tools and personnel to administer and monitor credit recovery programs in order to ensure adherence to stated requirements.</p> <p>Establish central verification of student eligibility in order to prevent concurrent enrollment in credit recovery courses and regular instruction courses within the Aspen system.</p>

4. Promotion and Graduation

DC Code, DCMR, and DCPS Grading Policy establish the standards that govern the promotion and graduation of DCPS students. Properly applying district standards for promotion and graduation is key to accuracy and integrity of graduation reporting.

a) Observations and Recommendations

Area	Observations	Recommendations
Overall Policies and Procedures	DC Official Code § 38-781.02(b)(2), states that “No student with more than 30 unexcused absences in a school year shall be promoted unless the principal submits a written explanation justifying the decision	Perform analysis to ensure that schools are complying with this requirement.

	to the Chancellor before the promotion is made."	
Systems and Technology	The electronic verification of graduation eligibility in some cases identified students as eligible for graduation when they had not met DCPS graduation requirements.	Perform recurring quality assurance on Aspen's graduation verification results to ensure that no students are granted diplomas who do not meet the requirements for graduation.
Monitoring and Accountability	DCPS policy does not require immediate review of records included for graduation requirements. Verification is conducted at the school's discretion.	Develop standardized accountability practices that would detect if a student is being improperly certified for graduation.

III. AUDIT AND INVESTIGATION APPROACH

To assess the validity of the various allegations across DCPS, A&M conducted an investigation which included data analysis, document review, on-site and off-site interviews of high school personnel, and interviews with DCPS leadership personnel and subject matter experts (“SMEs”). This Final Report includes DCPS-wide findings identified through the course of this investigation.

In addition to the staff interviews outlined in the on-site investigation approach, A&M interviewed the following DC officials, DCPS leadership, and Central Office staff:

- Deputy Mayor for Education
- Chancellor of DCPS
- Chief of Secondary Schools
- Deputy Chief of Compliance and Policy
- Chief of Talent and Culture
- Deputy Chief of IMPACT
- Members of the Academic Planning & Support team
- Instructional Superintendent for Cluster 8
- Deputy Chancellor Social Emotional Academic Development
- Deputy Chief Information Officer
- Aspen Manager
- Deputy Director of Labor Management and Employee Relations

A. Data Collection and Analysis

Aspen, DCPS’s student information system, is the primary electronic data source for this investigation. DCPS uses the third-party software to record attendance, grades, assignments, report cards and other information about students.

To develop an understanding of Aspen and other data systems in use at DCPS, A&M conducted interviews with DCPS’s Deputy Chief Information Officer (“DCIO”) and members of the Office of Enterprise Applications and Data Systems. Additionally, A&M interviewed teachers and designated SMEs on Aspen at DCPS high schools to confirm our understanding of the system’s application. A&M also reviewed DCPS’s Aspen data dictionary, frequently asked questions, and systems manuals.

1. Data Collection

On December 12, 2017, A&M received data from DCPS in the form of an SQL Server database backup reflecting all Aspen data tables. The database A&M received contained grading and attendance data for all DCPS high schools.

A&M's DCPS-wide analysis included all 177 of the 2017 graduates included in A&M's Interim Report on Ballou, as well as all other students coded in Aspen as exit code 2020: "*Graduated with regular, advanced, international baccalaureate, or external degree program (EDP) diploma*" who were also listed in DCPS's 2017 comprehensive certified graduates list. Combining these students with all Ballou graduates resulted in a total of 2,758 graduates.

2. Data Analysis

A&M performed data analysis both to identify the number of instances of policy violations where applicable, and to support our on-site interviews and records review. This analysis included a review of the following:

- Attendance records, for both excused and unexcused absences - Attendance was analyzed at the course level, rather than at the day level. Attendance analysis was combined with data on grading to assess compliance with the excessive unexcused absence requirements of the Grading Policy.
- Grade and transcript data - Advisory (quarterly) grade data (also referred to as term data), final grade report information, and transcript data were analyzed to assess compliance with credit recovery policies which require students to take and fail an original credit course before taking credit recovery.

B. On-Site Investigations

A&M conducted on-site school investigations at each of the 19 DCPS high schools for which graduation rates were reported in SY16-17. The purpose of these on-site visits is two-fold: 1) to understand how DCPS high schools implemented policies and procedures related to grading, credit recovery, and graduation that are outlined in DCPS policies and procedures and District of Columbia laws and regulations and 2) to review student records for 2017 graduates so that specific attributes could be tested.

A&M selected and performed on-site interviews of various high school personnel. In addition, we also received many requests for interviews from teachers for off-site interviews. In total, A&M performed 142 on-site and off-site interviews of key employees at 19 high schools district-wide, including:

- Principals
- Assistant principals
- Guidance counselors
- Credit recovery coordinators
- Teachers (regular instruction and credit recovery)

Of the 142 school-level interviews performed, A&M spoke with 78 teachers, the majority of whom taught core courses to seniors in SY16-17.

C. Student Data and Record Review

To accurately assess adherence with policies, A&M conducted analysis for each of a randomly-selected sample of 617 students across 18 DCPS high schools, as well as all 177 Ballou graduates included in the Interim Report on Ballou.

A&M reviewed the following records for sample students in the graduating class of 2017:

- Student cumulative folders
- Copies of final transcripts
- Copies of final report cards
- Community service verification forms
- Grade change forms

In addition to a record of the grades students earned for courses they took throughout high school, the transcript also includes the Letter of Understanding (“LOU”), which is an electronically-generated checklist of courses taken against graduation requirements. The LOU lists out each graduation requirement, the number of credits the student has received in that area, and the percentage completion for each requirement. A student whose LOU reports ‘100% Completed’ for each graduation requirement is eligible to graduate. The LOU serves as an automated method for certifying students for graduation.

A&M manually reviewed student transcripts to determine whether the automated transcript certification process accurately included only students who met the graduation requirements. A&M examined the LOU to ensure that all graduation requirements on the LOU marked “100% Completed” had corresponding passing grades on the student’s final transcript. A&M also checked the transcripts against the final report cards to verify that each credit and grade on the final report card was consistent with what was reflected on the transcript.

A&M performed a high-level review of community service hours for students in the sample. A&M reviewed community service verification forms to determine whether forms are completed appropriately with supervisor signature and whether they generally reflected work performed for qualified organizations. A&M also checked to see whether hours verified on forms found matched the hours reported on the transcript and the 100-hour graduation requirement.

IV. FINDINGS

A&M's key DCPS-wide findings are presented below. The findings presented here in A&M's Final Report reflect data across all DCPS high schools, incorporating the Interim Report findings that only included Ballou.

A. DCPS-wide Findings

1. Credit recovery is misused at most DCPS high schools, violating DCPS Policies and DCMR.

Credit recovery programs are intended to offer alternative pathways to earn credits to students who have struggled to succeed in traditional classroom settings. Credit recovery programs within DCPS are overseen by the Office of Academic Planning and Support within the Office of the Chief of Schools. DCPS's ECR Manual establishes specific and detailed guidelines for the implementation of ECR. Despite these detailed requirements, most high schools have created credit recovery programs that do not comply with the ECR Manual, and also violate DCPS Grading Policy and seat hour requirements for original credit courses.

Unit recovery: Students at several schools participated in after school or online credit recovery programs which allow students to re-take one quarter worth of content which they originally failed. These courses are offered concurrently with the original credit course as the school year proceeds, so students are working to master prerequisite knowledge while continuing to more advanced concepts. Unit recovery can in some cases contribute to grade changes not in compliance with policy. Staff have reported that unit recovery has been used to bring students' grades up in time for graduation instead of to develop and demonstrate mastery of content in line with the expectations of regular instruction courses. The process of original credit grades with grades earned through credit recovery violates 5-E DCMR §2200.8 which stipulates that grades should not replace previously-earned marks.

Daytime credit recovery: At some DCPS high schools, credit recovery courses are offered during the school day in place of regular coursework, or during short "intervention periods". Many schedules utilized for daytime credit recovery do not meet long enough to satisfy seat hour requirements for full credit courses. The eligibility requirements specified in the ECR Manual are not consistently adhered to for daytime credit recovery.

Twilight: At several general education campuses, the Twilight Program offers content in a similar format to credit recovery, but grants original credit. Twilight guidance distributed by the Office of Academic Planning and Support specifies that this program should be utilized only for students who are over age and under-credited. However, at several schools these courses have been offered to students who do not meet those requirements. In many cases, students are enrolled in several Twilight courses in the same

quarter, earning as many as three credits despite spending less than 3 hours a day, 4 days a week in class for a maximum of 9 weeks (108 total hours).

Evening Credit Recovery: Schools across DCPS have utilized the Evening Credit Recovery (“ECR”) program inconsistently with documented guidance, offering original credit without authorization, failing to enforce attendance policies, and in some cases allowing teachers to instruct subject matter for which they are not certified. At many schools, students are enrolled in several credit recovery courses at once, while teachers and staff across the district acknowledged that courses often start late, and end early.

Across all variations of credit recovery, DCPS staff and administrators have expressed concerns that the curriculum and rigor associated with credit recovery programs is not consistent with regular instruction expectations. Courses do not meet frequently enough or long enough to meet seat hour requirements, and student eligibility is not verified by guidance counselors before scheduling students for credit recovery courses. District-wide, teachers expressed concerns that students had no interest in attending traditional courses because they could take credit recovery. Many teachers who followed DCPS policy and failed students with excessive absences, saw students graduate despite failing a core course because they had been inappropriately enrolled in credit recovery concurrently.

Although each of the major findings above reflects school-level decision-making contradictory to the ECR Manual, these issues have developed in part due to a lack of central control over the credit recovery programs. DCPS Central Office provided insufficient structure, support, and accountability for the credit recovery programs to be implemented in accordance with the ECR Manual.

Unclear lines of accountability: Credit recovery programs are supported by school-level credit recovery coordinators who report either directly or indirectly to the school principals. Credit recovery teachers are typically chosen at the school level and are responsible to school administrators for their work in credit recovery in addition to their regular responsibilities. Credit recovery coordinators and teachers are monitored to some extent by the Office of Academic Planning and Support, but all evaluation is done at the school level. Many principals with large credit recovery programs expressed that they felt DCPS was responsible for providing oversight and ensuring compliance with policies, and that they had very-limited visibility into or control over these programs which granted so many credits in their schools. Credit recovery staff evaluation was not generally informed by any assessment of compliance with DCPS policies.

Insufficient staffing: For most of SY 16-17, only one Central Office employee was tasked with full-time support and oversight of the credit recovery programs across all DCPS high schools. This employee was a credit recovery specialist with insufficient authority and resources to manage a large program across many schools and principals.

Inconsistent leadership: Personnel in leadership positions responsible for overseeing credit recovery exhibited significant turnover throughout SY 16-17. Throughout these changes, schools reported receiving varying levels of support, guidance, and oversight.

Limited monitoring for compliance: Many of the requirements stipulated by the ECR Manual, if adhered to, would have reduced abuse of the credit recovery programs to graduate students outside of compliance with policy. Requirements for original credits, attendance requirements, and parallel enrollment could be identified and eliminated using relatively simple data analysis, however, the Office of Academic Planning and Support had very-limited data visibility and reporting related to credit recovery.

Contradictory messaging: School-level officials expressed that they had received unclear messaging around the goals and requirements of the credit recovery programs, and that although staff in the Office of Academic Planning and Support had been supportive of appropriate implementation of programs in compliance with requirements, they had received mixed messages about eligibility and other policies from more-senior staff. For example, in April of 2017, the Office of the Chief of Schools distributed guidance via email to DCPS high school credit recovery staff, which instructed school staff to continue enrolling students in term 4 ECR courses for original credit if they were not on track to graduate. The communication also stated that no original credit courses were to be offered in summer school due to circumstances that were not detailed. This guidance conflicts with procedures in the ECR Manual, and indicates the DCPS Central Office was aware of and encouraging use of credit recovery for original credit at DCPS high schools.

2. Attendance-related grading policies are not enforced across DCPS.

DCMR 5-E § 2103.7-9 clearly states, and the DCPS Grading Policy repeats, that secondary students with excessive unexcused absences should receive grade reductions and/or fail courses. Across the district, however, students have been allowed to pass courses despite excessive unexcused absences, at times missing the majority of the course.

Permissive use of make-up work: DCPS's current Grading Policy allows for students to complete make-up work whether absences are excused or unexcused. While it is fair to allow students to complete make-up work for excused absences, permissive use of make-up work for unexcused students, paired with lax enforcement of attendance-related grading policy has removed the incentive for students to attend class regularly. Across the district, teachers have reported that students expect to receive make-up work despite excessive excused absences.

Unclear and contradictory interpretation of policies: Misinterpretation of policies at many DCPS high schools was used to justify bypassing the attendance-related grading policy. Across DCPS, teachers and

administrators quoted both 5-E DCMR § 2200.4 and the Washington Teacher's Union Collective Bargaining Agreement as communicating that "the primary responsibility for evaluating the work of the student shall rest with the teacher." High school administrators and staff have misinterpreted this line to mean that teachers have complete autonomy over how they grade their students, and that the attendance-related grading policy was an optional guideline for teachers to follow rather than a mandate. DCPS should clarify that teachers have autonomy over their gradebooks within the confines of the regulations and policies.

School staff unaware of policy requirements: Teachers at many schools, and some administrators claimed to be totally unaware of the attendance-related grading aspect of the DCPS Grading Policy. DCPS's rollout of the Grading Policy in SY15-16 was not appropriately supported by training, and, as explained further below, including user guides for the Grading Policy which did not reference the attendance-related grading policy requirement.

3. Lack of support and oversight from DCPS contributed significantly to DCPS staff across schools failing to adhere to policies.

Throughout the course of this investigation, A&M identified that individuals across most DCPS high schools failed to adhere to policies and violated DCMR, contributing to a large number of students graduating due to policy violations. A&M conducted 158 interviews, assessed policies and procedures, and reviewed training materials and support tools to understand factors contributing to policy violations. Through this investigation and audit, A&M found that a lack of support and oversight from DCPS Central Office contributed significantly to policy violations system-wide related to grading, credit recovery, excessive absences, and graduation of ineligible students.

Poor rollout of DCPS Grading Policy: The Grading Policy released in SY15-16 was not appropriately supported with a district-wide rollout. Instead the policy was distributed to principals via email by support staff in the Office of the Chief of Secondary Schools. The policy was distributed with several summary documents which were intended to summarize the key requirements of the new policy, however, the summary documents distributed to teachers and for Parents failed to outline the attendance-related grading requirements. The lack of formal training for teachers on this new policy, and the distribution of user guides which did not include these critical provisions as stipulated by DCMR contributed to the policy's misinterpretation and misuse.

Limited training and support for systems: When DCPS transitioned from the Student Tracking and Reporting System ("STaRS") to Aspen, DCPS provided no formal training to staff at high schools, instead relying on a "train-the-trainer" approach, making individual teachers who were not experts in Aspen responsible for training and supporting colleagues during the implementation of this complex system. Teachers identified as trainers sometimes reported that they were engaged by DCPS only to help their colleagues set up grade books, but were treated as though they were responsible for providing ongoing support.

Limited analytical support for school leaders and teachers: Teachers and Administrators are generally unfamiliar with the reporting capabilities of Aspen and do not have access to reporting and analysis needed to enforce policies in an efficient manner. Many of the policies which DCPS struggled to enforce in SY16-17 would be more easily enforced if supported by simple analysis and regular reporting. For example, combining course-level attendance data to identify students with >5, 10, or 30 unexcused absences would empower teachers to enforce the attendance-related grading policy.

4. Most DCPS high schools exhibit a culture of passing.

In recent years, DCPS has focused on improving graduation rates, which can serve as a key measure of academic success for K-12 school systems. Improvement in graduation rates only reflects true improvement in outcomes if measured against a consistent baseline of standards. Throughout the course of this investigation, DCPS staff expressed concerns that it was increasingly difficult to fail students, contributing to a culture in which passing and graduating students is expected of administrators and staff, sometimes at the cost of academic rigor. A&M's document review and interviews across the district revealed that within DCPS, significant administrative and institutional pressures discourage teachers from failing students. Due in part to system-wide policies and standards which include promotion and graduation as an indicator of success, and increasingly burdensome documentation requirements for failing students at most high schools, a culture of passing students has grown to be the norm, sometimes in contradiction to standards of academic rigor and integrity.

Empathy for the extreme needs of the DCPS student population: Throughout the course of this investigation the A&M team noted the unique challenges present within DCPS's student population. DCPS students face many challenges in maintaining regular attendance not faced by most high school students, including high rates of poverty, homelessness, work and childcare responsibilities, interaction with the court system, and many others. A&M recognizes these challenges do contribute to absenteeism in DCPS, however this analysis cannot, and does not, attempt to account for these challenges.

IMPACT and graduation/promotion rate goals: As discussed in Appendix B: Performance Management Review, principals and teachers are evaluated against specific goals under the IMPACT system. For most principals and teachers, metrics for evaluation include passing, promotion, or graduation rate goals. Although the goal-setting process has been described by DCPS as collaborative between district and principal, multiple principals indicated that they were given a specific ACGR and promotion rate number during their goal planning sessions with DCPS Central Office, and that they didn't have significant input on these metrics. At some specific schools, teachers spoke to limits on the number of students they felt comfortable failing, driven by the graduation and promotion goals set for principals. Many DCPS employees indicated that these goals established an expectation that only very few students could be marked as failing before either they or their supervisors would be rated as ineffective.

Administrative burden to fail students: Teachers across multiple schools described a significant and growing administrative burden associated with failing students. Teachers are required to show that they have made efforts to communicate with parents about failing students and to document all steps of communication. Teachers are required to develop instructional support plans, and to offer make-up work for students that have missed assignments whether absences are excused or not. At schools with higher absenteeism, interventions require significant amounts of teacher time. In some cases school administration applied a very strict interpretation of the requirements for communication and intervention that increased the documentation requirements to fail students.

Together, these requirements contributed to what many teachers described as a “culture of passing,” where the default expectation was for teachers to pass their students regardless of the number of absences or level of work students had completed.

B. Analysis Results

The section below combines each of these analyses on a per-student basis to identify the total number of students whose graduation benefited from these policy violations.

1. *Graduates Missing Required Coursework*

A&M’s student data and record review included a thorough evaluation of a sample of DCPS graduates’ final transcripts to verify that students had met all graduation requirements¹. A&M identified that **of 617 students in the sample, 13 students (2.1%) were missing credits in courses required to earn a DC Diploma**. In addition, **of the 177 Ballou graduates reviewed, three students (1.7%) were missing credits in courses required to earn a DC Diploma**.

Although manual transcript review could have identified the missing credits, IT system challenges contributed to these students receiving diplomas despite missing courses. In one case, a student was awarded credit on their final transcript for a core course despite a final mark on the transcript of ‘F.’ In all cases, the automated LOU indicated that the student was eligible to graduate.

2. *Excessive Absences and Grading Policy Adherence*

a) Regular Instruction Courses

A&M’s investigation found many DCPS high schools are non-compliant with DCPS Grading Policy, particularly pertaining to the impact of excessive absences on student grading. Many teachers did not apply the grade reductions required for excessive absences. In order to test for compliance with this policy, A&M analyzed final grade data for every DCPS high school graduate, and compared it to course-

¹ Graduation Requirements evaluated in accordance with (DCMR) Title 5 (Education), Subtitle 5-A (Office of the State Superintendent of Education), Chapter 22

specific attendance data. Figure 4 below summarizes the attendance of each student in each individual course required for graduation. Of a total of 12,579 (full and partial-year) regular instruction courses that resulted in credit towards a graduation requirement, 1,125 courses were passed by students who had 30 or more unexcused absences.

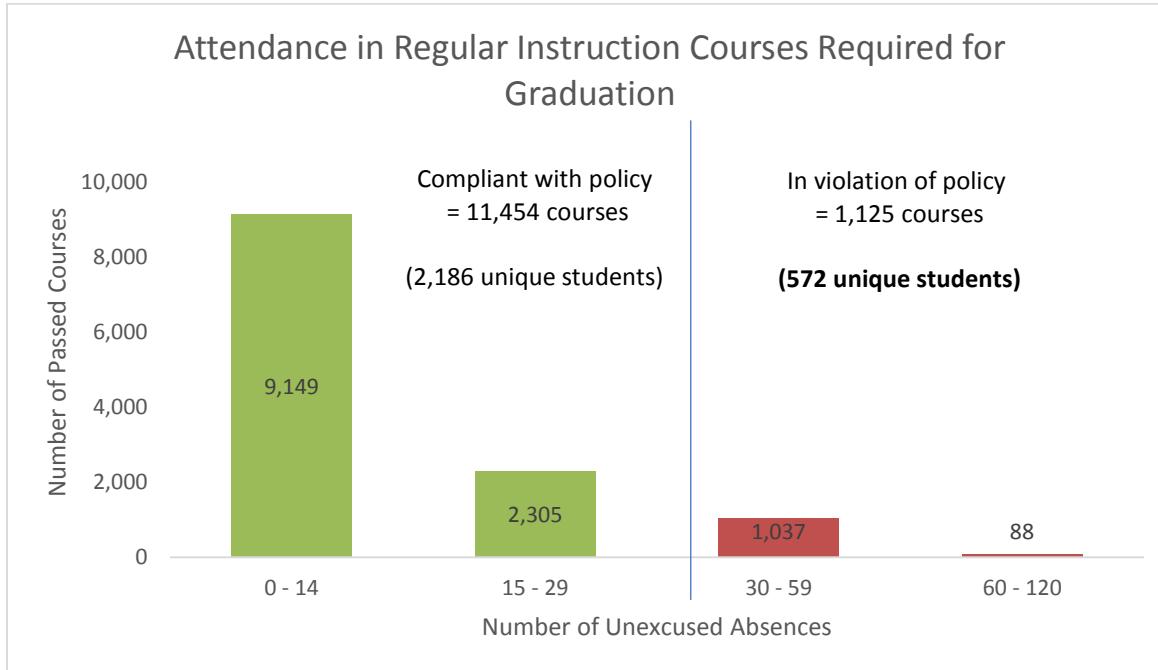


Figure 4: Attendance in Regular Instruction Courses Required for Graduation

Across these courses, **572 unique students at 16 high schools passed despite excessive unexcused absences**. The only three schools in which no students had excessive unexcused absences in regular instruction courses were Benjamin Banneker High School, McKinley Technology High School, and School Without Walls High School. All three schools are application schools and have strict attendance requirements. Students who do not meet these requirements are “uninvited,” or asked to return to their neighborhood schools.

Additional data analysis, as outlined in Figure 5, indicates that **system-wide, only 42 students failed every course in which they had excessive absences**.

Attendance and Grading Summary by Student		Count of Students	% of Graduates
Excessive Absences in Regular Instruction Courses Required for Graduation in SY16-17			
Total number of graduates		2,758	
Compliant	Did not have 30 or more unexcused absences in any course	2,144	77.7%
	Failed all courses with 30 or more unexcused absences	42	1.5%
Non-Compliant	Passed at least one course with 30 or more unexcused absences	572	20.7%

Figure 5: Excessive Absences in Regular Instruction Courses Required for Graduation in SY16-17

b) Evening Credit Recovery Courses

The ECR Manual defines specific limits for student absences in ECR courses, stating that students may miss no more than three class sessions before they are ineligible to receive credit, and must be dropped from the ECR course. Despite these specific procedures on credit recovery attendance, many Ballou students enrolled in credit recovery logged absences in excess of the stated limits.

Figure 6 below summarizes the attendance of each student in each individual credit recovery course. Of a total of 911 ECR courses which resulted in credit, 727 courses were passed by students who had three or more unexcused absences.

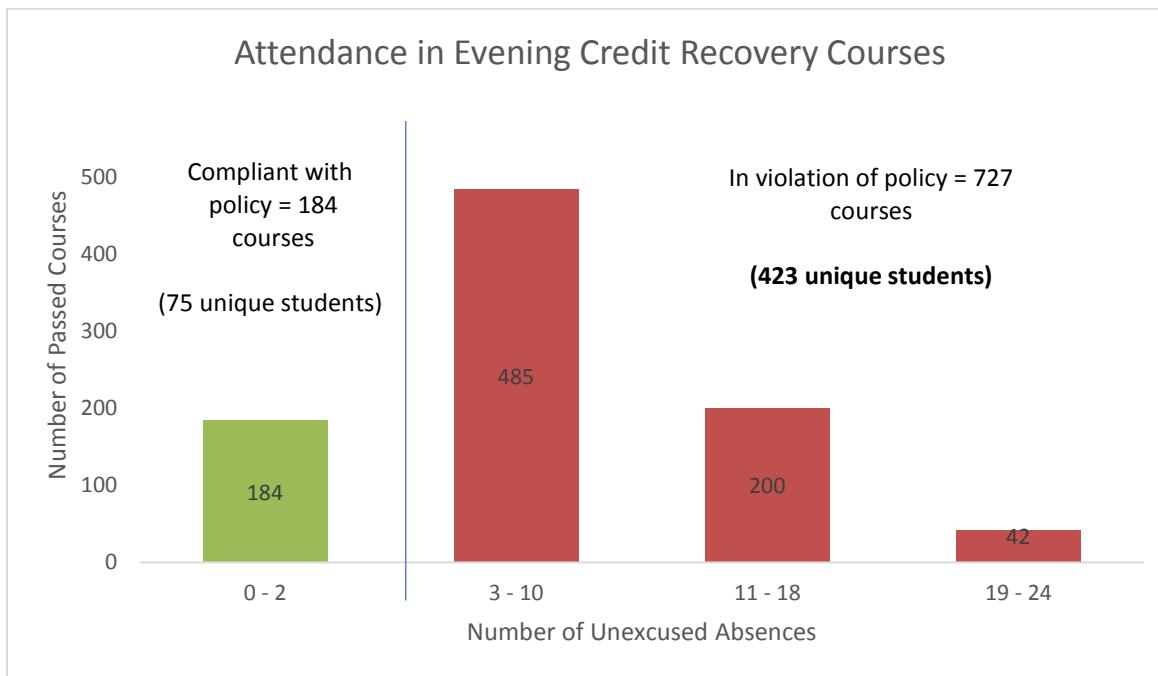


Figure 6: Evening Credit Recovery Absences

Across these courses, **423 unique students passed despite excessive unexcused absences**. Additional data analysis, as outlined in Figure 7, indicates that among students with excessive unexcused absences in ECR, only 26 failed every course in which they had excessive absences.

Attendance and Grading Summary by Student		Count of Students	% of Students
Excessive Absences in Evening Credit Recovery Courses in SY16-17			
Total number of graduates who took an evening credit recovery course		498	
Compliant	Did not have 3 or more unexcused absences in any course	49	9.8%
	Failed all courses with 3 or more unexcused absences	26	5.2%
Non-Compliant	Passed at least one course with 3 or more unexcused absences	423	84.9%

Figure 7: Excessive Absences in Evening Credit Recovery Courses in SY16-17

c) Daytime Credit Recovery Courses

Figure 8 below summarizes the attendance of each student in each individual daytime credit recovery course. Since these courses take place during the day, the attendance policy for regular instruction courses is applied. Of a total of 180 daytime credit recovery courses which resulted in credit, 35 courses were passed by students who had 30 or more unexcused absences².

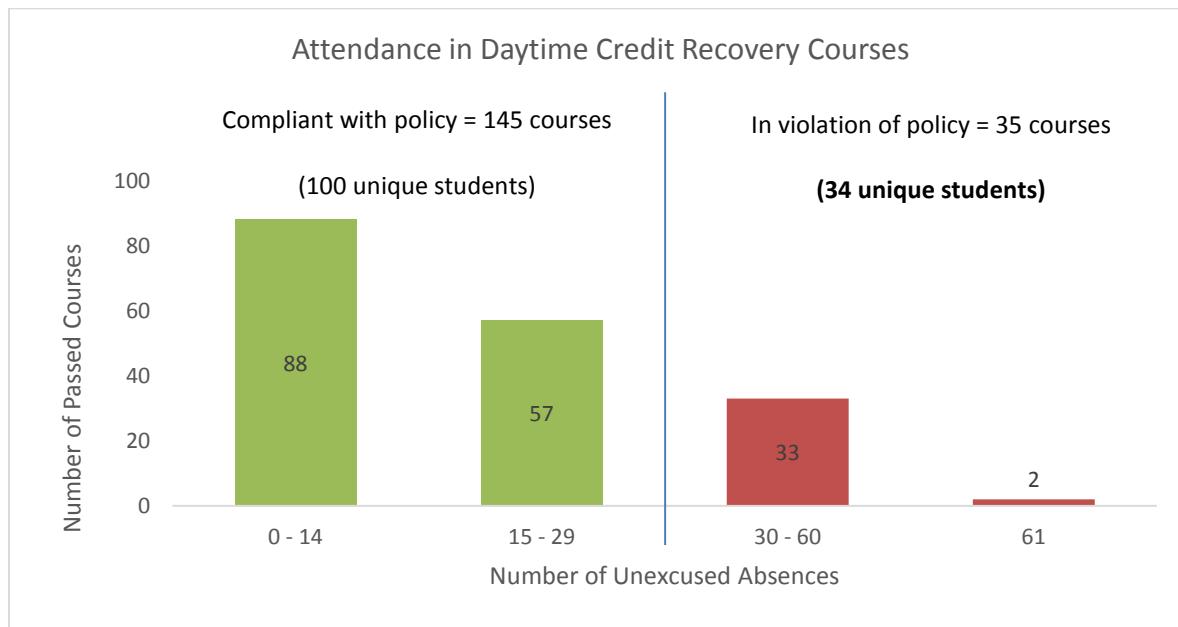


Figure 8: Daytime Credit Recovery Attendance Summary

Across these courses, **34 unique students passed despite excessive unexcused absences**. Additional data analysis, as outlined in Figure 9, indicates that among students with excessive unexcused absences in daytime credit recovery, only seven failed every course in which they had excessive absences.

Attendance and Grading Summary by Student		Count of Students	% of Students
Excessive Absences in Daytime Credit Recovery Courses in SY16-17			
Total number of graduates who took a daytime credit recovery course		134	
Compliant	Did not have 30 or more unexcused absences in any course	93	69.4%
	Failed all courses with 30 or more unexcused absences	7	5.2%
Non-Compliant	Passed one course with 30 or more unexcused absences	34	25.4%

Figure 9: Excessive Absences in Daytime Credit Recovery Courses in SY16-17

² Ballou STAY and Roosevelt STAY also offer daytime credit recovery courses that are coded with “CR” for credit recovery rather than “RR” for daytime credit recovery. A&M adjusted its analysis of daytime credit recovery to properly reflect this coding.

The A&M team interviewed multiple credit recovery teachers and support staff. When questioned about the lack of adherence to attendance policies for credit recovery, teachers explained that they were unaware of credit recovery attendance requirements, or did not feel that adequate technological or administrative supports were in place to remove students based on excessive absences. Additionally, teachers stated that, similar to failing students in regular instruction courses, the administrative burden to remove a student based on excessive absences in credit recovery was too high considering the number of students.

d) Excessive Absences Summary

Figure 10 summarizes the adherence to attendance policies for regular instruction, ECR, and daytime credit recovery courses. Overall, 822 unique students passed regular instruction or credit recovery courses despite excessive absences.

Attendance and Grading Summary by Student	Count of Graduates	% of Graduates
Excessive Absences in Regular Instruction and Credit Recovery in SY16-17		
Total number of graduates	2,758	
Passed a regular instruction course required for graduation with 30 or more unexcused absences	572	20.7%
Passed an evening credit recovery course with 3 or more unexcused absences	423	15.3%
Passed a daytime credit recovery course with 30 or more unexcused absences	34	1.2%
# unique students who passed courses despite excessive absences	822	29.8%

Figure 10: Excessive Absences in Regular Instruction and Credit Recovery in SY16-17

3. *Credit Recovery Policy Adherence*

DCPS's credit recovery program relies on schools to administer credit recovery programs in accordance with policies, with very limited support from DCPS Central Office. In SY16-17, only one full-time, permanent employee was responsible for overseeing the programs across DCPS. Schools were provided limited guidance and/or support beyond the ECR Manual.

a) Original Credit Requirement

Of the SY16-17 graduates DCPS-wide, 411 students received credit for credit recovery courses despite never having taken the original credit course. Additionally, of the 55 students who took credit recovery courses concurrently with the original credit course, 36 students received credit for only the credit recovery course. Some students may have received credit in only the regular instruction course or in both the regular instruction course and the credit recovery course, in which case the student would have received credit for the course without the policy violation anyway. Several students failed both the regular instruction course and credit recovery course. Overall, 439 unique students violated the original credit requirement for credit recovery courses.

Credit Recovery Summary by Student	Count of Students	% of Students
Original Credit Requirement Violation in SY16-17		
Total number of graduates who took a credit recovery course	607	
Passed a credit recovery course without taking the original credit course	411	67.7%
Passed only a credit recovery course while concurrently taking the original credit course	36	5.9%
Total Unique Students Benefitting from CR Original Credit Violations	439	72.3%

Figure 11: Original Credit Requirement Violations in SY16-17

4. Consolidated Analysis Findings

To identify the combined effect that non-adherence to DCPS policies and DCMR regulations has had on the 2017 graduation rate across DCPS, A&M developed a consolidated workbook which includes all 2017 DCPS graduates and evaluated whether their graduation was facilitated by non-adherence to any of the requirements analyzed above. For each of the 2,758 students who were reported to have graduated, A&M has identified policy violations which aided their timely graduation, focusing only on courses which were required to graduate.

A&M's analysis found that **822 students benefited from policy violations related to attendance-related grading for regular instruction and credit recovery courses** in SY16-17, indicating that, if not for the policy violation the students would have failed and not graduated. A&M's analysis found that **411 individual students** were enrolled inappropriately in credit recovery without having taken the original credit course and **36 students** earned credit from a credit recovery course taken concurrently with the original credit course.

Figure 12 summarizes A&M's findings in this investigation. Each line reflects the number of students benefiting from policy violations in one or more course. These findings reflect only violations observed to have taken place in SY16-17. Some students may be aided by multiple policy violations and the total reports the number of unique students with who benefitted from policy violations.

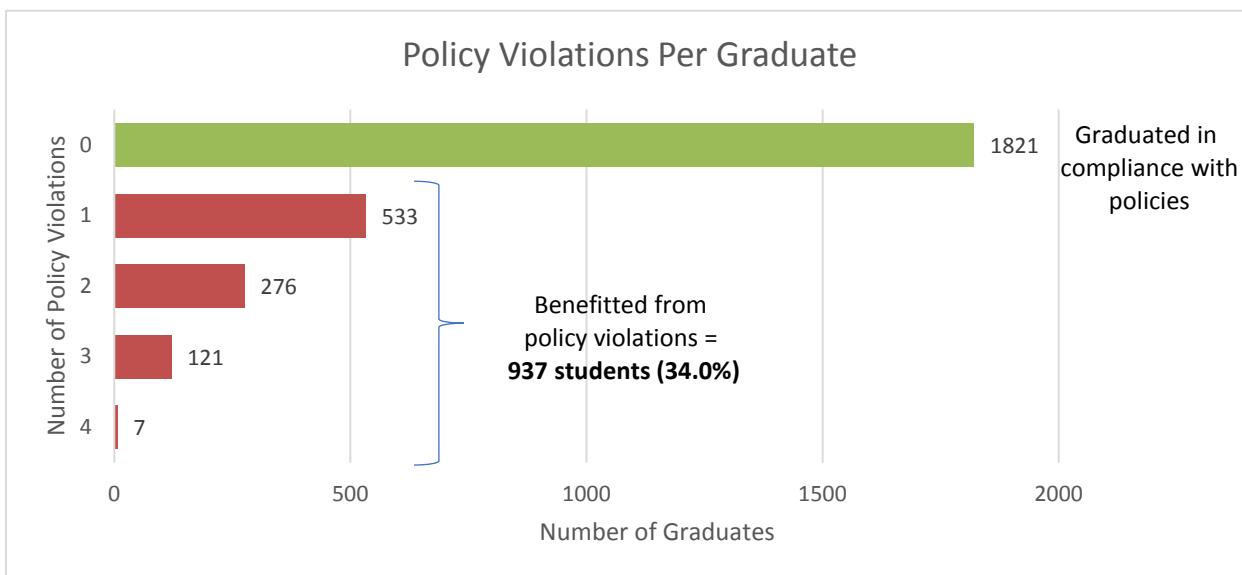
A&M found that of the **2,758 SY16-17 DCPS graduates, 937 (34.0%) students graduated with the assistance of policy violations.**

Graduations Due to Policy Violations in SY16-17		
Total number of graduates	Count of Students*	% of Graduates
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	572	20.7%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	423	15.3%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	34	1.2%
Credit Recovery Earned as an Original Credit	411	14.9%
Credit Recovery Earned Taken Concurrently with Original Credit Course	36	1.3%

Total Graduations Due to Policy Violations	937	34.0%
Total Graduations without Policy Violations	1,821	66.0%
<i>*Count of students is not unique. Students may have more than one policy violation, so these counts cannot be added up. Total Graduations Due to Policy Violations is a count of unique students.</i>		

Figure 12: Consolidated Findings

To demonstrate the degree to which individual students are affected by multiple policy violations and account for the overlap between issues identified in this report, Figure 13 below summarizes the number of students affected by unique policy violations.

**Figure 13: Total Policy Violations per Student**

In addition to the data analysis A&M performed on all 2017 graduates, A&M reviewed a random sample of 617 transcripts to identify students who were missing credit for required coursework. This included a sample of at least 20% of 2017 graduates at each DCPS high school. A&M identified that **of 617 students in the sample, 13 (2.1%) students were missing credits in courses required to earn a DC Diploma**. This was found at six schools. As transcript review was performed on just a sample of students, Figure 13 above, does not include these identified policy violations. The results of this analysis are presented within Figure 14 as a percentage of the sample.

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	617	
Missing Required Coursework	13	2.1%

Figure 14: Sampled Graduates Missing Required Coursework

This number is in addition to the results of the Ballou investigation. A&M identified that of 177 Ballou SY16-17 graduates, three students were missing credits in courses required to earn a DC Diploma.

5. School-Level Findings

The table below provides a high-level summary of findings at each high school across DCPS. Included in this table are measures of student demographics to provide context of the challenges students at DCPS high schools may face and the variations between different types of schools. Additional site-specific observations and recommendations are included in Appendix A: School Summaries.

Findings by School	Student Demographics				Results of Investigation						
	Economically Disadvantaged %	ELL %	Special Education %	Count of Graduates	Excessive Absences - Regular Instruction	Excessive Absences - Evening Credit Recovery	Excessive Absences - Daytime Credit Recovery	Credit Recovery Earned as Original Credit	Credit Recovery Taken Concurrently	# of Graduates with Policy Violations	% of Graduates with Policy Violations
Neighborhood Schools											
Anacostia HS	100%	0%	31%	106	54	50	0	27	1	74	69.8%
Ballou HS	100%	0%	25%	177	76	49	17	48	14	112	63.3%
Woodson, H.D. HS	100%	1%	25%	163	72	28	0	16	0	77	47.2%
Eastern HS	100%	1%	26%	198	67	37	0	10	0	89	44.9%
Roosevelt High School	100%	36%	21%	113	19	33	0	29	0	49	43.4%
Cardozo EC	100%	48%	22%	141	21	41	0	38	1	56	39.7%
Dunbar HS	100%	3%	23%	166	3	33	0	23	1	40	24.1%
Coolidge HS	100%	25%	24%	70	1	10	0	12	1	15	21.4%
Wilson HS	24%	7%	12%	396	31	18	0	25	2	57	14.4%
Subtotal				1,530	344	299	17	228	20	569	37.2%
Application Schools											
Columbia Heights EC (CHEC)	100%	35%	9%	252	23	31	0	49	1	71	28.2%
Ellington School of the Arts	100%	1%	6%	115	7	3	0	3	4	12	10.4%
Phelps ACE HS	100%	3%	14%	86	1	5	0	2	0	8	9.3%
McKinley Technology HS	100%	2%	3%	118	0	1	0	1	6	8	6.8%
Benjamin Banneker HS	100%	1%	0%	96	0	0	0	0	0	0	0.0%
School Without Walls HS	18%	0%	1%	147	0	0	0	0	0	0	0.0%
Subtotal				814	31	40	0	55	11	99	12.2%
Opportunity Academies											
Luke C. Moore Alternative HS	100%	2%	12%	116	39	84	0	84	0	101	87.1%
Roosevelt STAY @ MacFarland	51%	6%	6%	98	60	0	2	5	1	60	61.2%
Washington Metropolitan HS	100%	1%	28%	53	30	0	0	0	0	30	56.6%
Ballou STAY	90%	0%	11%	147	68	0	15	39	4	78	53.1%
Subtotal				414	197	84	17	128	5	269	65.0%
Total	77%	12%	14%	2,758	572	423	34	411	36	937	34.0%

Source: DCPS School Profiles, <http://profiles.dcps.dc.gov/>

Figure 15: Findings by School

V. RECOMMENDATIONS

A. Improve DCPS Central Office oversight and enhance accountability at high schools.

DCPS should develop enhanced oversight capabilities to monitor programs and policy compliance at DCPS high schools, and emphasize adherence to policies and regulations as a key responsibility for all employees. DCPS should hold school leaders accountable for enforcement of policy requirements within their schools, and provide avenues for school employees to report potential policy violations. The following steps will support DCPS to enhance oversight and accountability:

- **Make accountability and policy adherence everyone's job:** A common justification for policy violations detailed in this report was a lack of awareness of policy. Every DCPS employee needs to be fully aware of all policies and procedures that apply to their job, and understand that policy adherence is required. To reinforce these requirements, DCPS should consider emphasize policy adherence in performance management tools such as IMPACT.
- **Strengthen Central Office accountability function:** DCPS should augment accountability functions within Central Office to proactively monitor policy adherence and drive compliance at schools. This function should be professionally staffed and empowered with appropriate authority and resources to continually monitor adherence to policies at individual schools and escalate violations as personnel matters when appropriate. DCPS should use data analysis combined with school level surveys of policy application to ensure consistent application of policies within schools.
- **Enhance internal audit function:** DCPS should enhance its internal audit function and broaden its scope to include academic integrity. This strengthened group should investigate complaints of wrongdoing within DCPS schools. Existing avenues for complaints, including the grievance process, should be augmented by an anonymous email inbox and tip line which are monitored by internal auditors. DCPS should develop and deliver communications about this new inbox and tip line for all employees, which emphasize anonymity and protection from retaliation.

B. Provide additional support to improve the consistency and accountability of credit recovery at DCPS high schools.

Credit recovery programs, when well-managed and controlled, can provide important opportunities for students to master content and make progress toward graduation. Across DCPS, however, these programs have been misused, often being offered to ineligible students and granting last-minute credits just in time for graduation. DCPS needs to make significant investments in improving support for these programs at schools, and providing additional oversight and accountability.

Improve staffing and authority: For most of SY16-17, only one resource was dedicated to this function, and much of the role focused on providing administrative support for staffing, payroll, and other functions, leaving minimal time to assess compliance with policies and procedures. DCPS needs a consistent, professional staff with the appropriate authority to oversee credit recovery at all DCPS high schools where it is used.

Provide analysis and reporting: As discussed further below in Section D, DCPS can strengthen compliance with program requirements by improving its use of Aspen and other automated tools to maintain compliance with policy. For credit recovery, DCPS should develop standardized eligibility verification which identifies students who are eligible to participate in credit recovery. Similar to A&M's recommendations for monitoring unexcused absences in regular instruction courses, automated processes should be developed to identify students who have exceeded 3 days of unexcused absences from credit recovery courses and drop students who fail to attend regularly. DCPS can also monitor for over-enrollment in credit recovery courses, and concurrent enrollment using data analysis to prevent the misuse of credit recovery programs.

Reconcile credit recovery with Carnegie unit seat hour requirement: Various iterations and school-level adaptations of credit recovery programming have included course schedules which fail to meet the 120-seat hour requirement. DCPS needs to adjust permitted schedules for credit recovery to ensure that all formats appropriately meet district requirements for seat hours.

Enrollment and curriculum audits: Due in part to the limited staff support for credit recovery roles in SY16-17, DCPS had limited capacity to conduct enrollment and curriculum audits. Data analysis indicated, and employees across the district confirmed that credit recovery policies were not strictly adhered to and many teachers voiced concerns about the academic rigor and quality of credit recovery coursework. DCPS should provide additional resources, including appropriately-qualified professional staff to conduct audits of enrollment and curriculum in credit recovery programs.

C. Improve policies and procedures.

Well-designed policies and procedures help to drive better understanding of and adherence to district expectations at the school level. DCPS has two key policies related to the issues discussed within this report, which provide a base for improved policies and procedures within the district. These policies are the Grading Policy and the ECR Manual. Though these policies effectively communicate many of DCPS's expectations, each policy can be strengthened and improved to reduce the risk of error, misinterpretation, and misuse. The recommendations below can improve consistency and accountability related to the issues identified in this audit and investigation, however, A&M recommends that any major policy changes be developed collaboratively with DCPS stakeholders, and be analyzed carefully for any potential

unintended consequences. Additional recommendations related to policy improvement are included in A&M's DCPS Policies and Procedures Review.

Grading Policy: The DCPS Secondary School Grading Policy was developed collaboratively with the DCPS community, aligns with many education best practices, and incorporates most of the DCMR requirements for grading and reporting within DCPS. However, DCPS needs to take steps to improve the Grading Policy to provide further clarification and consistency. DCPS should work collaboratively with stakeholders at schools and in the community to:

- Reconcile policies that intended to provide students with multiple opportunities to pass with attendance-related grading requirements codified in 5-E DCMR §2103.7-10. This includes policies surrounding make-up work, student support plans, and student right to earn a passing grade after progress reports.
- Outline strict requirements for exceptions to any grading policies in compliance with DCMR requirements, and establish a DCPS-controlled process to approve these limited exceptions to policies.
- Include in the Grading Policy the DC Code § 38-781.02(b)(2) requirement that “No student with more than 30 unexcused absences in a school year shall be promoted unless the principal submits a written explanation justifying the decision to the Chancellor before the promotion is made.”
- Specify clear eligibility requirements on the usage of make-up work within DCPS that confine its use to cases of legitimate excused absences and specify the appropriate timeline of make-up work grade entry and total impact.
- Verify that policy requirements are internally consistent and remove any contradictory or potentially confusing language in the Grading Policy surrounding make-up work timelines.
- Additionally, address other points outlined in the grading policies and procedures section of this report.

Credit recovery policies and procedures: Over the past several years, the ECR program has been governed by a reasonably-complete and improving operations manual, however other credit recovery or alternative programs such as Twilight, daytime credit recovery, and unit recovery are operating with limited formal documentation and guidance from DCPS. DCPS should improve the policy framework around credit recovery programs in the following ways:

- Develop a credit recovery policy manual to encompass all non-traditional programming within DCPS that includes attendance requirements, Carnegie Unit/seat hour requirements, and eligibility requirements.
- Outline policy prohibitions regarding original or parallel enrollment in credit recovery courses, and require centralized eligibility verification using analytics.

- Outline clear requirements for the appropriate use of grade changes in alignment with DCPS Grading Policy. If grade changes are required by programs, create detailed forms for use in processing changes, and require collection and retention of all forms.
- Require curriculum plans on CR courses to be submitted to Central Office and outline procedures for audits to verify equivalent rigor and content to original courses.
- Additionally, address other points outlined in the credit recovery policies and procedures section of this report.

Relationship to other instructions: All updated DCPS policies should be developed in a manner that is consistent with other relevant instructions and requirements, including collective bargaining agreements between DCPS and its employee unions.

D. Enhance systems and supports to improve consistency and accountability.

Many of A&M's observations and recommendations focus on the need for improvement of DCPS oversight into programs and activities at high schools. Although the oversight recommendations within this report will require additional dedicated time from DCPS leaders and support staff, a number of system improvements can support DCPS in enhancing its oversight and monitoring capabilities. A&M identified the following opportunities for improvement during the course of this audit and investigation:

Attendance/grading reporting capabilities: Teachers interviewed indicated that they could not readily determine which students in their courses had absences that had been excused or unexcused, and that a highly-manual process was required to determine if a student should receive a grade reduction or fail due to unexcused absences. DCPS can strengthen compliance with policies around attendance-related reporting by Aspen's functionality so that teachers can easily see the aggregate excused and unexcused absences for each student at the course level. Further, DCPS should consider automating the failure due to absences process to reduce the administrative burden on teachers.

Audit trails and controls over system access: As part of A&M's effort to analyze grade changes in Aspen, we have identified many limitations in Aspen's ability to capture all system-generated and manual changes to student records. A&M also noted that school personnel had access to modify student grade and attendance records long after grade entry and attendance update deadlines. These limitations make it challenging to properly analyze the changes being made to student records and increase the opportunity for student record manipulation. DCPS should establish cutoff dates after which school-level personnel would no longer have access to student attendance, grades or transcripts whereby any additional changes required would have to go through a centralized DCPS approval process.

Suspension data: Suspensions are considered to be excused absences. Currently, suspension data is tracked in the Student Behavior Tracker system ("SBT") and automatically feeds into Aspen, updating

student daily attendance to reflect suspended students as excused absences (i.e. with disciplinary reason noted). The SBT system, however, does not update Aspen for period/course attendance. Teachers, therefore, have no visibility into whether students in their courses have been suspended, and therefore are not provided with sufficient information to appropriately apply the failure due to absences policy. A&M's understanding is that DCPS is currently working to get SBT to update period attendance and expect this process to be implemented in the current school year.

Improve graduation certification: Aspen is configured to automatically identify students that are on track for graduation by mapping of the DCPS course catalog to graduation requirements. During A&M's review of student transcripts, it is evident some schools are relying on the automated process without performing a manual check of all senior transcripts prior to graduation. Though the automated process is very efficient and appears to effectively identify students who have met graduation requirements, A&M has identified some instances where there is an error in this process resulting in some students who have not met all graduation requirements being reflected as though they have. A manual check would catch any issues in the system mapping. This would ensure that all students have met graduation requirements and would identify any shortcomings in the system mapping so that they could be appropriately corrected.

Standardization of Aspen: Aspen is a highly customizable system and it is evident that schools have some flexibility in how the system is customized. This, however, can make it challenging to perform DCPS-wide analysis and monitoring. A&M recommends that DCPS review and standardize data entry in Aspen, identifying fields to be used across all schools. This standardization will facilitate DCPS' ability to provide oversight and monitoring across the school system.

By improving systems, and implementing automated tools for reporting which are available to schools and DCPS administrators, DCPS can provide for efficient compliance with, and enforcement of grading, credits recovery, and attendance policies.

VI. OTHER FINDINGS AND OBSERVATIONS

A. Attendance Record-Keeping Practices Require Further Analysis and Investigation

Any analysis on attendance-related grading policy adherence performed within DCPS relies upon the quality and accuracy of DCPS's attendance data entries in Aspen. Errors in the data, or manipulation of records by school staff, can make it difficult for DCPS or OSSE to accurately report on challenges at individual schools. During the course of A&M's investigation, DCPS staff expressed concern that teacher-entered absences had been manipulated from present to absent. A&M assessed the validity of these reports by analyzing the total number of period-level attendance entries for graduates which had been changed at each school across DCPS. A&M found that while changes from present to absent were rare, at some schools a significant number of teacher-entered attendance records had been changed from absent to present. The chart below summarizes the findings of this analysis by presenting the total number of absent-to-present changes more than one day after the original absence was marked by the teacher.

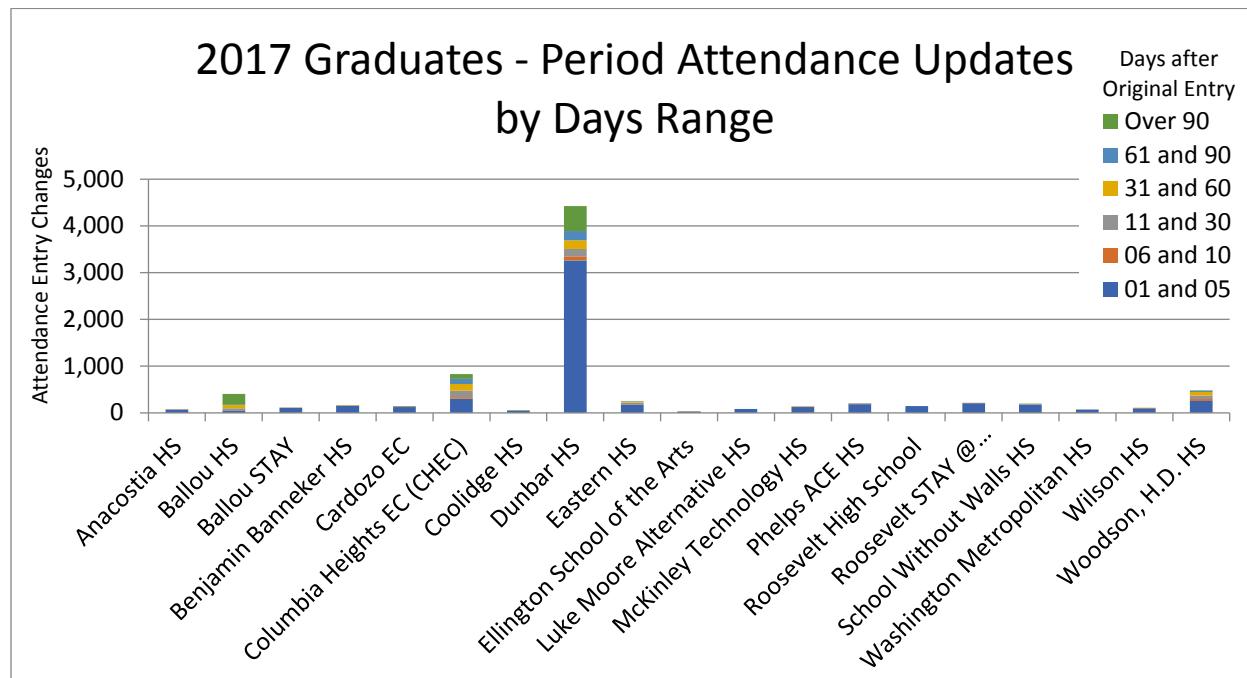


Figure 16: Period Attendance Changes

The most significant changes were noted at Dunbar HS where over 4,000 changes were made to the attendance records of 118 graduates (i.e. from absent to present) over a day after the absence. Among those changes were over 1,000 changes occurring over 15 days after the original attendance was submitted, in violation of 5-A DCMR § 2101.4(b).

A&M has not reviewed school-level paper records for attendance changes, or sought to identify justifications for these changes at Dunbar or any other high school; however, given the results of our data analysis, and multiple reports of attendance record manipulation at Dunbar, this issue requires further analysis and investigation. Additional details on these findings and recommendations can be found in Appendix A: Site Visit Summaries.

B. Student Enrollment and Cohort Management

During high school on-site visits, some administrative staff described the administrative burden of active cohort management that is experienced by DCPS neighborhood high schools. Established feeder patterns result in 8th grade students being automatically enrolled to these high schools upon promotion to 9th grade. These students are all then counted as part of the entering 9th grade cohort at the high school in question even though many of these students do not ultimately enroll at the school. The high school's administration is required to track down all students assigned to the 9th grade cohort regardless of whether the students ever showed up to the school. If 30% of the assigned cohort never shows up to the school, the school would be on track to having at most a 70% graduation rate for that graduating class unless the school spends its resources to track down the missing students. The administrators further indicated that, in many instances, these students are located in other schools within the District but there is no information exchange to allow the high schools to know when a student transfers to another school within the District (i.e. whether it be a public charter school or non-public school).

C. Performance Management Goals

As discussed in A&M's key finding "Most DCPS high school exhibit a culture of passing," the performance management system, IMPACT, has been seen by many to contribute to pressures to pass, promote, and graduate students in DCPS high schools. During the course of site visits at DCPS high schools, A&M heard from school leaders and teachers at many schools that they felt that the ambitious performance goals related to ACGR, promotion rate, and passing rate were unattainable while following DCPS policies and DCMR. To assess the validity of these concerns, A&M reviewed IMPACT guidelines, school-specific CSC rubrics for teachers, and student outcome goals for school leaders.

A&M's review of goals for DCPS employees found that school leaders across DCPS were evaluated based in part on measures of promotion and ACGR, while teachers at ten schools were evaluated based on passing percentage. Although goals varied from school to school, some AGCR metrics were as high as 80-90% and did not appear to reconcile with known issues of absenteeism and appropriate enforcement of attendance-related grading policies. Additionally, some ACGR goals appeared unachievable in relation to pre-existing cohort demographics.

Although many DCPS staff conveyed concerns that job security was dependent on meeting performance goals, A&M found that no principals benefited from performance bonuses due to policy violations.

DCPS should consider updating performance management goals tied to passing, promotion, and graduation to ensure that they do not place undue pressure on school leaders and teachers, and to appropriately align with policy requirements and cohort realities. Additional information on the calculation of performance metrics for school leaders and teachers is included in Appendix B: Performance Management Review.

D. Additional Document Review Findings

A&M collected records from all DCPS schools including, transcripts, report cards and grade change forms. A&M reviewed these records for anomalies, with a particular emphasis on a manual assessment of transcript validity in light of graduation requirements. A&M identified other potential issues and anomalies, which did not impact graduation status, but merit further investigation and follow-up by DCPS. These include:

- **Course progression issues:** Illogical course progressions occurred regularly on transcripts. One example: English I being taken as credit recovery during senior year after already having taken English II-IV. Some students also earned their two required language credits by taking the first course of two unlike languages, for example: French I and Spanish I rather than showing progression through the same language.
- **Excessive senior year credits:** Some students had an excessive number of credits in their senior year. In some cases students took up to 18 credits in the senior year.
- **Uncharacteristically high credit recovery grades:** In many cases students earned significantly higher grades in credit recovery courses than they did in their other original credit courses. A&M found many examples where students would receive D's or F's in regular instruction courses, but then go on to earn A's and B's in equivalent credit recovery courses.
- **Double credits for the same course:** Some students received credits for taking the same course twice, which could result in students being pushed over the 24 credit minimum to graduate.
- **Transcripts that do not match report cards:** Some variations were found between report cards and transcripts, including slight mismatches in grades and courses taken in final report cards and transcripts.
- **Algebra or Geometry 1A/1B taken in isolation:** Some DCPS schools split Algebra and Geometry courses into two distinct courses, labeling them as Algebra or Geometry 1A/1B. DCPS awards credit when students take only the 1B portion of this course, explaining that if a student can pass a 1B course they have demonstrated mastery of the concepts taught in the 1A course. However, it is likely that some content is not fully reflected in 1B, and this could be a potential pathway to removing content and awarding a credit for a reduced level of content.

APPENDIX A: SCHOOL SUMMARIES

The following school summaries present analysis and findings for each DCPS high school. A&M recommends these school summaries be used to support follow-up on school-specific issues to understand and remediate challenges related to Grading Policy adherence and credit recovery programs district-wide. Included within these summaries is a summary of A&M's findings at Ballou. For a more-detailed review of Ballou, please review A&M's Interim Report on Ballou.

Recommendations included within school summaries should be implemented cooperatively by DCPS and school leadership to improve consistency and accountability.

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ANACOSTIA HIGH SCHOOL

Anacostia is a neighborhood high school. A&M conducted the on-site investigation at Anacostia on January 8, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 107 students reviewed, a total of 75 (70.1%) graduations were impacted by policy violations. Of the 25 students sampled, a total of 2 (8.0%) were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Anacostia High School			
Total Number of Graduates	107		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	55		51.4%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	50		46.7%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	27		25.2%
Credit Recovery Earned Taken Concurrently with Original Credit Course	1		0.9%
Total Graduations Impacted by Policy Violations		75	70.1%
Total Graduations Not Impacted by Policy Violations	32		29.9%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 1: Consolidated Findings

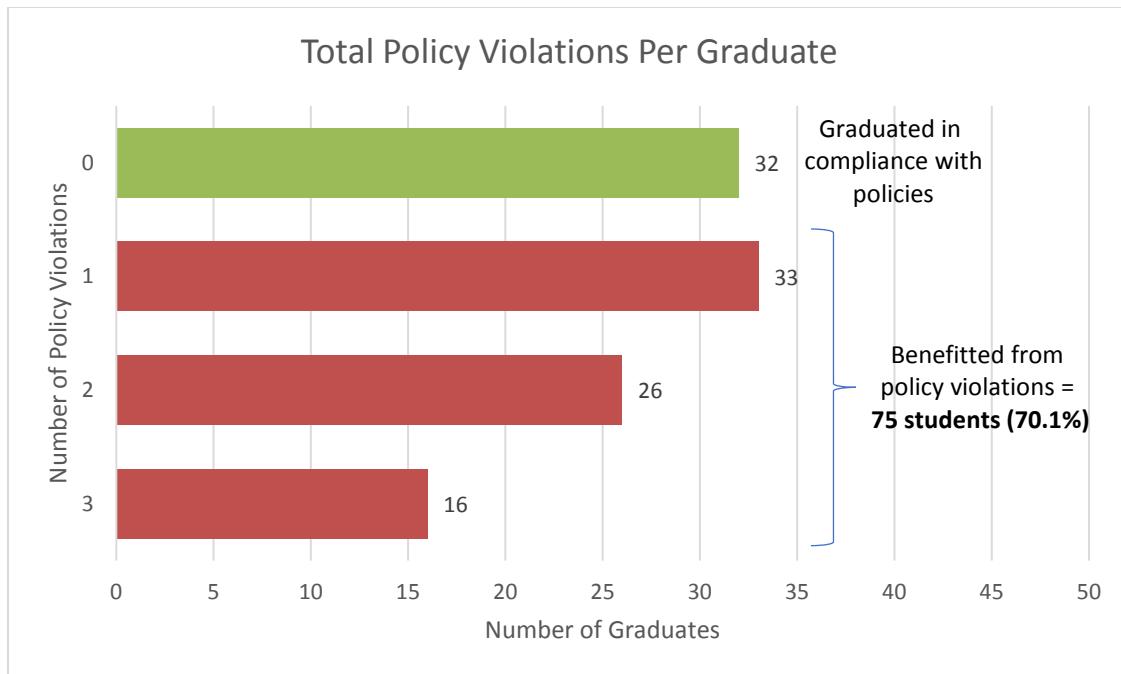


Figure 2: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	25	
Missing Required Coursework	2	8.0%

Figure 3: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Teachers and staff were not trained on or aware of the attendance-related grading policy. In previous years, credit recovery was used for original credit without formal DCPS approval. This was corrected during the second half of SY16-17 with the employment of a new credit recovery program manager. An interviewee noted that some teachers were teaching credit recovery for courses in which they were not certified.
School Culture / Pressures	<ul style="list-style-type: none"> Staff describe a “make-up packet culture” in which many students intentionally miss class because they know they can request make-up work at the end of term. Some teachers felt pressured by administrators and/or students to provide make-up work to failing students.

	<ul style="list-style-type: none"> Some staff felt students were promoted without mastering course content.
Performance Management	<ul style="list-style-type: none"> Absenteeism and other challenges associated with the student population present challenges that may make pass, promotion, and graduation rate goals for school leaders unattainable if the attendance-related grading policy is properly enforced. The school goals for SY16-17 included goals for ACGR, promotion rate, in-seat attendance rate, and suspension rate. The teacher CSC rubric does not appear to contain pressures that may encourage policy violations.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

BALLOU HIGH SCHOOL

Ballou is a neighborhood high school. A&M conducted six on-site investigations at Ballou between December 13, 2017 and January 9, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review of all Ballou graduates, rather than taking a sample. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

The tables below present the analysis performed for every school. A&M reviewed the records for all Ballou SY16-17 graduates as discussed in the Interim Report. Of the 177 students reviewed, a total of 113 (63.8%) graduations were impacted by policy violations. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17		
Ballou High School		
Total Number of Graduates	177	
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	76	42.9%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	49	27.7%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	17	9.6%
Credit Recovery Earned as an Original Credit	48	27.1%
Credit Recovery Earned Taken Concurrently with Original Credit Course	14	7.9%
Total Graduations Impacted by Policy Violations	112	63.3%
Total Graduations Not Impacted by Policy Violations	65	36.7%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed. Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 4: Consolidated Findings

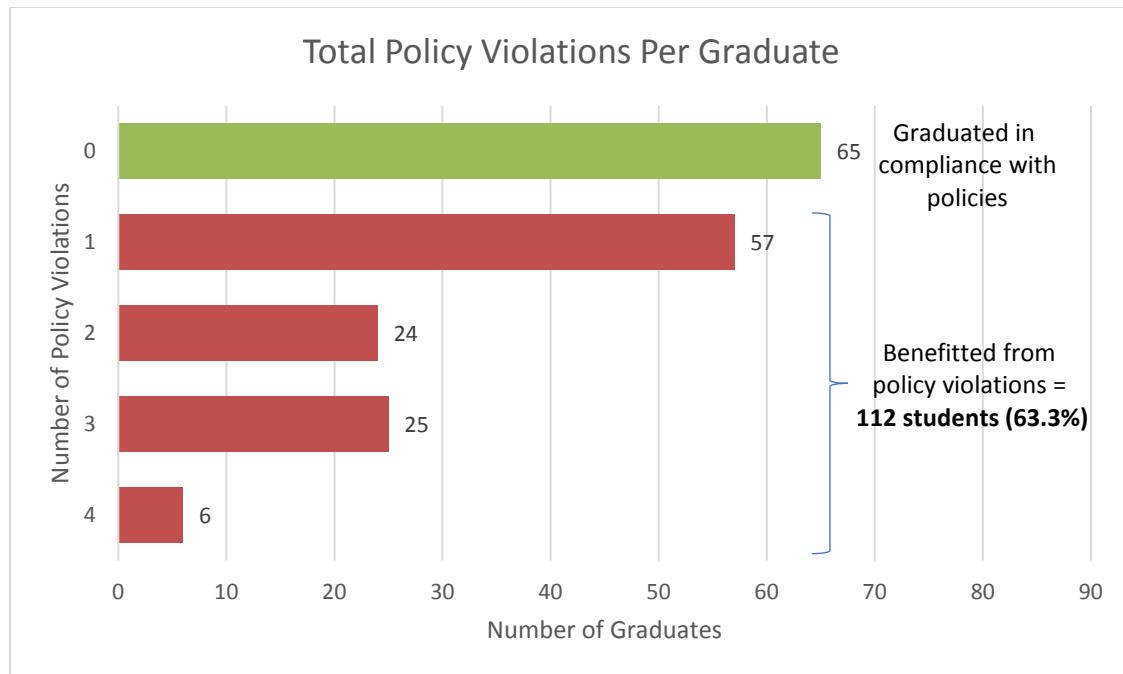


Figure 5: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	177	
Missing Required Coursework	3	1.7%

Figure 6: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Ballou is non-compliant with the attendance-related grading policy. Some teachers were unaware of the policy and some understood the policy to mean that they had complete autonomy over grading. Other teachers said they had been encouraged by school leadership to interpret policies to give students every chance possible due to the difficult circumstances faced by students. Teachers were instructed via email and in-person communications that the lowest grade possible at Ballou is a 50, and, separately, that students with missing assignments should be marked with an (M) and graded as a 50. A grading floor does not align with DCPS policies. The M grade was misunderstood by some teachers to mean "Missing," rather than "Medical" and Ballou had a greater proportion of "M" grades used as term grades than at any other school. Many students received credit for credit recovery courses despite having never taken the original credit course. The Office of Academic Planning and Support

	<p>also did not grant approval for students to take credit recovery courses as original credit.</p> <ul style="list-style-type: none"> Students were regularly enrolled in credit recovery courses in parallel with an original credit course in the same subject. Some teachers described this practice as a sort of “insurance policy” to be used in cases where original credit course teachers were not guaranteed to award students passing grades. Ballou operated a daytime credit recovery program, which is not specifically allowed in accordance with the ECR Manual. It is unclear whether DCPS approved the semester-long daytime credit recovery courses which meet for an estimated total of 70 hours and award one full credit. Ballou did not delineate between ECR and daytime credit recovery course coding until the second semester of SY16-17, when DCPS instructed to track the courses separately.
School Culture / Pressures	<ul style="list-style-type: none"> Administrators communicated high passing percentage expectations to teachers in person, via staff meetings, via email, and formalized in the Ballou IMPACT CSC rubric. Teachers were encouraged to offer make-up work and extra credit to students regardless of excessive absences. Teachers at Ballou described direct and indirect pressures from school leadership to pass, promote, and graduate students regardless of content mastery. Many teachers stated that they felt intimidated or pressured to follow these more-lenient policies, and expressed concerns that they would be “IMPACTed out,” i.e., removed due to reduced CSC scores, if they refused to follow this guidance. Teachers were instructed in-person and via email that the minimum grade at Ballou was a 50 – this requirement is not consistent with the Grading Policy and has contributed to grade inflation at Ballou. Teachers felt pressure to adhere to this and other unofficial policies at Ballou which contributed to policy violations. The administrative burden to fail students is extremely high and generates a significant amount of extra work for teachers who wish to adhere to the Grading Policy. Administrators required teachers to demonstrate the completion of many interventions for any student receiving a failing grade, even those failing due to excessive absences. In many cases, teachers were left with the choice of developing documentation of supports, possibly incurring negative evaluations, or simply passing students.
School-Specific Findings	<ul style="list-style-type: none"> Ballou students face many attendance challenges not faced by most high school students, including high rates of poverty, homelessness, work and childcare responsibilities, interaction with the court system, and many others. Ballou High School exhibited extremely high teacher turnover during SY16-17. Of the approximately 50 Ballou teachers that taught seniors in SY16-17, only 28 are still employed by the school. Ballou faces significant challenges retaining qualified teachers, and regularly has courses taught by long term substitute teachers. This further complicated

	<p>evaluation of student mastery of content and presented challenges in assessing appropriate student grades at the end of courses during SY16-17.</p> <ul style="list-style-type: none"> • Numerous community service verification forms showed students were given credit for working at non-approved entities, such as at a daycare or a gym. • Some students took large numbers of credit recovery courses. Thirteen of Ballou's SY16-17 graduates earned more than 20% of their credits through credit recovery.
Performance Management	<ul style="list-style-type: none"> • Some teachers pointed out that it would not be possible to meet performance goals and be rated as an Effective or Highly Effective teacher if they adhered to the Grading Policy. • The school goals for SY16-17 included goals for ACGR, promotion rate, and in-seat attendance rate. • The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> ◦ "70-80% or higher of students are passing semester with grade D or higher" to receive a rating of 3 and "81+% or higher are passing semester with a grade D or higher" to receive a rating of 4 on CSC 3. ◦ "75-80% grade level in-seat attendance (ISA) rate" to receive a rating of either a 3 or "81+% grade level in-seat attendance (ISA) rate to receive a rating of 4 on CSC 4. • The teacher CSC rubric places administrative burden on teachers by requiring >80% of parents to be contacted for a rating of 3 and 100% of parents of to be contacted to receive a rating of 4 in CSC 4.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Review the credit recovery program thoroughly for adequacy and compliance with DCPS policies. Discontinue any programs not in alignment with DCPS policies.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

BALLOU STAY HIGH SCHOOL

Ballou STAY is an Opportunity Academy. A&M conducted the on-site investigation on January 18, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 147 students reviewed, a total of 78 (53.1%) graduations were impacted by policy violations. Of the 29 students sampled, a total of 3 (10.3%) were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Ballou STAY High School		147	
Total Number of Graduates		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	68	46.3%	
Passed Despite Excessive Absences in Evening Credit Recovery Courses	0	0.0%	
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	15	10.2%	
Credit Recovery Earned as an Original Credit	39	26.5%	
Credit Recovery Earned Taken Concurrently with Original Credit Course	4	2.7%	
Total Graduations Impacted by Policy Violations	78	53.1%	
Total Graduations Not Impacted by Policy Violations	69	46.9%	

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 7: Consolidated Findings

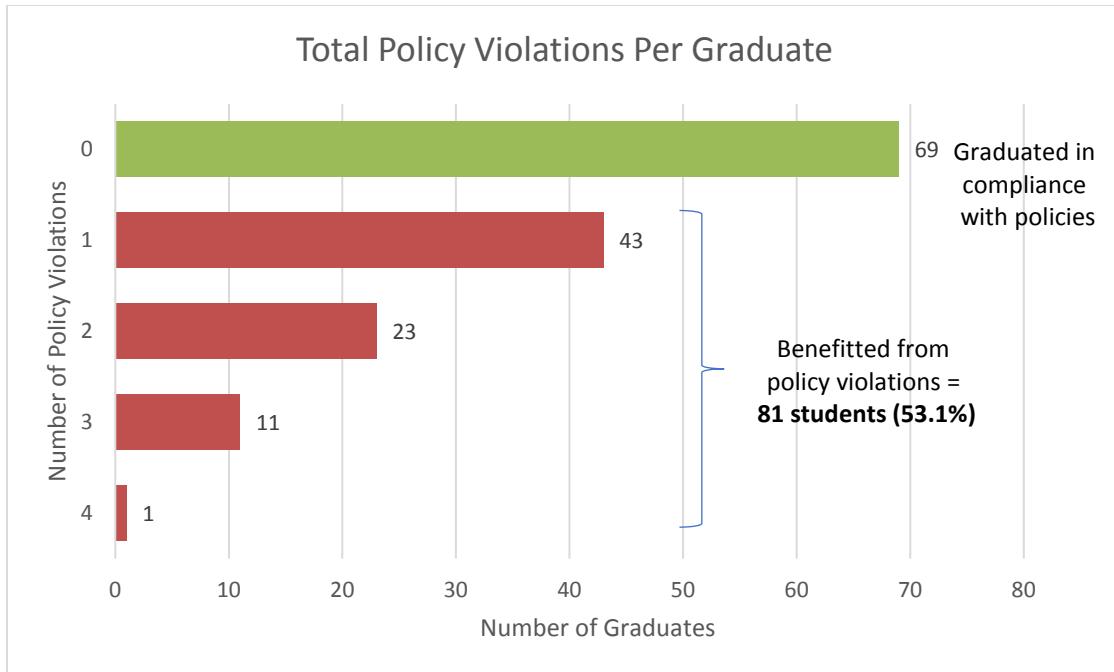


Figure 8: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	29	
Missing Required Coursework	3	10.3%

Figure 9: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> The attendance-related grading policy is not well-understood; staff expressed that DCPS had not trained, emphasized, or enforced the policy prior to the current academic year. Staff members demonstrated awareness of the Grading Policy, but expressed the tension of standard DCPS policies with the challenges of alternative school students. Some community service hours include academic activities that did not strictly meet the standard of work for nonprofit entities.
School Culture / Pressures	<ul style="list-style-type: none"> Staff expressed confidence and comfort with their administration, stating that they had not been instructed to inflate grades inappropriately.

	<ul style="list-style-type: none"> The STAY and alternative schools were explained to have a vastly different mission from other DCPS schools. Many interviewees expressed that the Central Office should establish policy exceptions for alternative schools.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric does not appear to contain pressures that may encourage policy violations.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Reevaluate the applicability of standard DCPS policies to alternative schools for attendance, grading, and graduation.

BENJAMIN BANNEKER HIGH SCHOOL

Banneker is an application high school. A&M conducted the on-site investigation on January 12, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 96 students reviewed, **none** graduations were impacted by policy violations. Of the 30 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Banneker High School			
Total Number of Graduates	96		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	0	0	0.0%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	0	0	0.0%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0	0	0.0%
Credit Recovery Earned as an Original Credit	0	0	0.0%
Credit Recovery Earned Taken Concurrently with Original Credit Course	0	0	0.0%
Total Graduations Impacted by Policy Violations		0	0.0%
Total Graduations Not Impacted by Policy Violations	96	100	100.0%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 10: Consolidated Findings

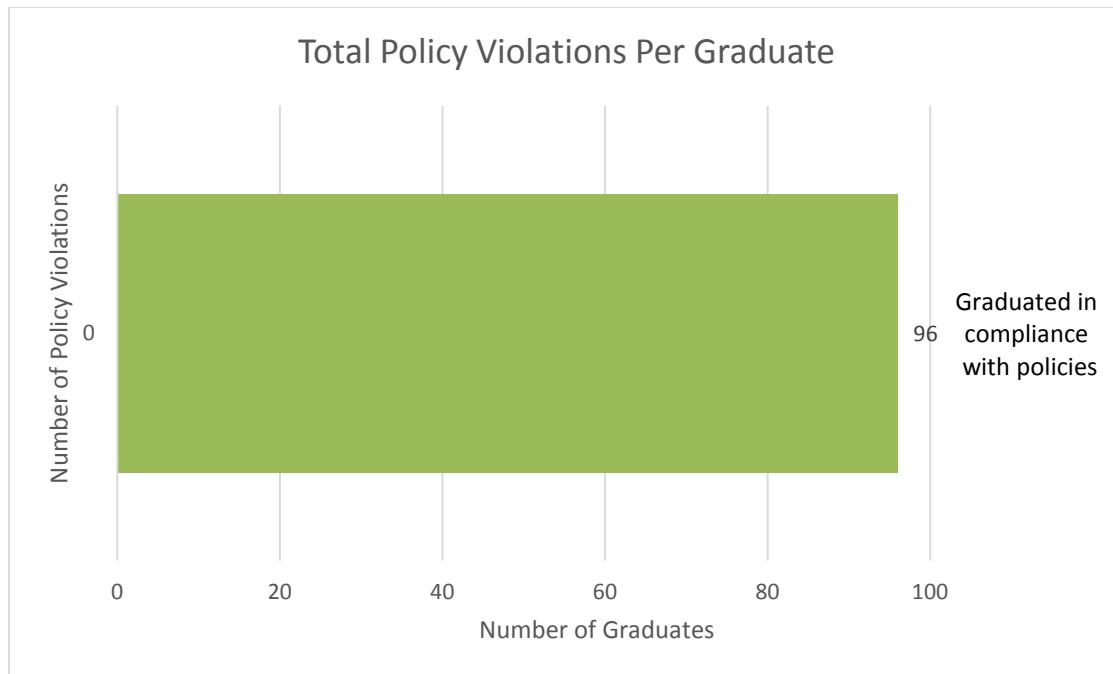


Figure 11: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	30	
Missing Required Coursework	0	0.0%

Figure 12: Sampled Graduations Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> • <u>No</u> students missed more than 30 days of school, nor did the school offer credit recovery courses in SY16-17.
School Culture / Pressures	<ul style="list-style-type: none"> • None of the individuals interviewed indicated pressure to increase graduation rates, pass students, or inflate grading.
School-Specific Findings	<ul style="list-style-type: none"> • Records at Banneker were highly organized. The cumulative folders were present and had expected documentation. The school requires 270 service learning hours and school staff retains a separate folder for each student to record their hours. Each folder retained extensive documentation for verification of hours.

Performance Management	<ul style="list-style-type: none">• The school goals for SY16-17 included goals for ACGR, promotion rate, and retention rate.• The teacher CSC rubric does not appear to contain pressures that may encourage policy violations.
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School-Specific Recommendations and Follow-Up

- No recommendations.

CARDOZO EDUCATION CAMPUS

Cardozo is a neighborhood school. A&M conducted the on-site investigation on January 18, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 141 students reviewed, a total of 56 (39.7%) graduations were impacted by policy violations. Of the 30 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Cardozo Education Campus			
Total Number of Graduates	141		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	21		14.9%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	41		29.1%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	38		27.0%
Credit Recovery Earned Taken Concurrently with Original Credit Course	1		0.7%
Total Graduations Impacted by Policy Violations		56	39.7%
Total Graduations Not Impacted by Policy Violations	85		60.3%
<small>*Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.</small>			
<small>Total Graduations Impacted by Policy Violations is a count of unique students.</small>			

Figure 13: Consolidated Findings

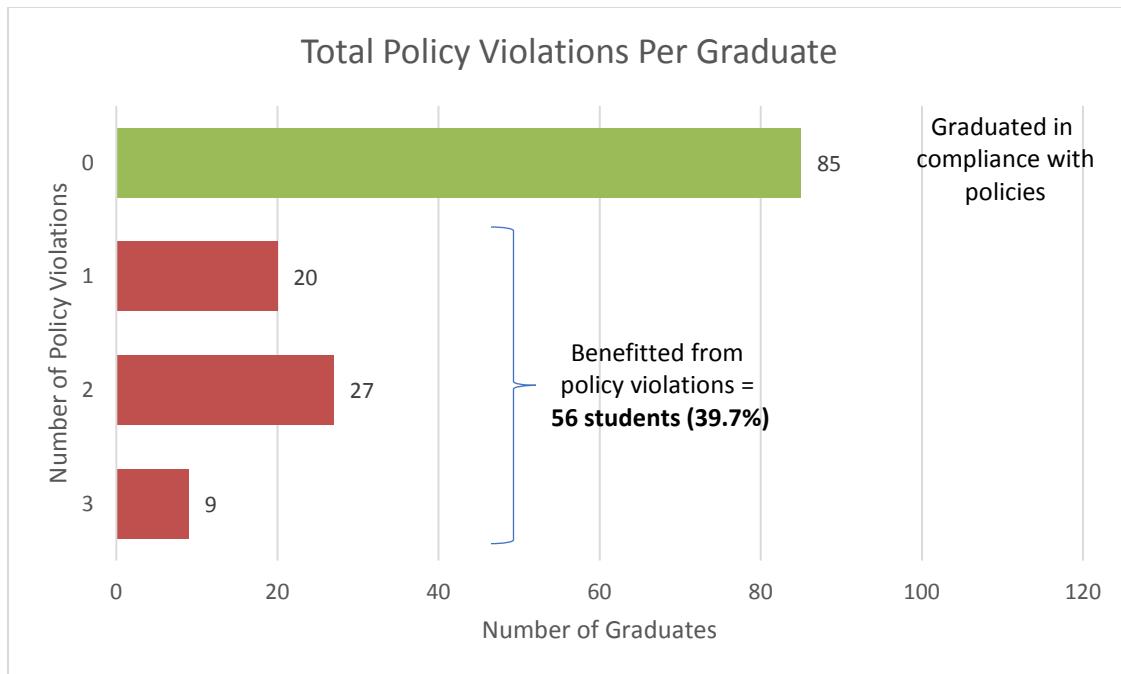


Figure 14: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total number of graduates sampled	30	
Missing Required Coursework	0	0.0%

Figure 15: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Staff were generally unaware of the attendance-related grading requirements of the Grading Policy. Teachers recalled the rollout of the Grading Policies, but did not recall learning about the attendance requirements. A teacher summary of the Grading Policy sent to Cardozo administrators by the Office of the Chief of Schools did not include explanation or reference to the attendance-related grading policy. Teachers who were aware of the attendance-related grading policy acknowledged allowing ELL students with excessive absences to pass if they had demonstrated mastery and completed make-up work. Teachers and administrators expressed that now that they have been made aware of the attendance-related grading policy, they are concerned they will not be able to meet performance goals.

	<ul style="list-style-type: none"> • Staff clearly understood the original credit requirements for credit recovery, but were not aware of the more-stringent attendance requirements for credit recovery courses. • Attendance requirements for credit recovery were loosely enforced. Some students with extreme absences were dropped. However, many students with four to 20 absences received credit.
School Culture / Pressures	<ul style="list-style-type: none"> • Teachers and support staff uniformly agreed that they felt pressures from DCPS's evaluation systems, but not from Cardozo administrators.
School-Specific Findings	<ul style="list-style-type: none"> • Cardozo faces unique challenges associated with a high percentage of English Language Learning students. According to staff, exceptions to policies related to original credit for Cardozo students have been requested and approved by DCPS's Language Acquisition Division (LAD) rather than the credit recovery team. • Credit recovery teachers are spread across several classes in the same period, and utilize online learning systems other than DCPS's Edgenuity platform to support students, which allows teachers to assign work not based on the DCPS curriculum.
Performance Management	<ul style="list-style-type: none"> • Administrators and teachers expressed concern that their performance goals in the IMPACT system did not reflect the unique needs of their student population and included unrealistic expectations for student passing, promotion, and graduation rates given Cardozo's attendance challenges, which may be unattainable with complete enforcement of the Grading Policy. • The school goals for SY16-17 included goals for ACGR, promotion rate, and suspension rate. • The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> ◦ “65-80% of students are passing your class” to receive a rating of 3 and “>80% of students are passing your class” to receive a rating of 4 on CSC 3. • The teacher CSC rubric places administrative burden on teachers by requiring >80% of parents to be contacted for a rating of 3 and 100% of parents to be contacted to receive a rating of 4 in CSC 4. • The CSC rubric for teachers does offer exceptions based on student circumstances. For example, some teachers with high concentrations of ELL and Special Education students have received exceptions.

School-Specific Recommendations and Follow-Up

- Teachers and support staff should be trained on DCMR and Grading Policy and credit recovery policy requirements and be provided with tools to support their compliance.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

COLUMBIA HEIGHTS EDUCATION CAMPUS

CHEC is an application school. A&M conducted the on-site investigation on January 8, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 252 students reviewed, a total of 71 (28.2%) graduations were impacted by policy violations. Of the 50 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Columbia Heights Education Campus (CHEC)			
Total Number of Graduates	252		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	23		9.1%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	31		12.3%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	49		19.4%
Credit Recovery Earned Taken Concurrently with Original Credit Course	1		0.4%
Total Graduations Impacted by Policy Violations		71	28.2%
Total Graduations Not Impacted by Policy Violations	181		71.8%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 16: Consolidated Findings

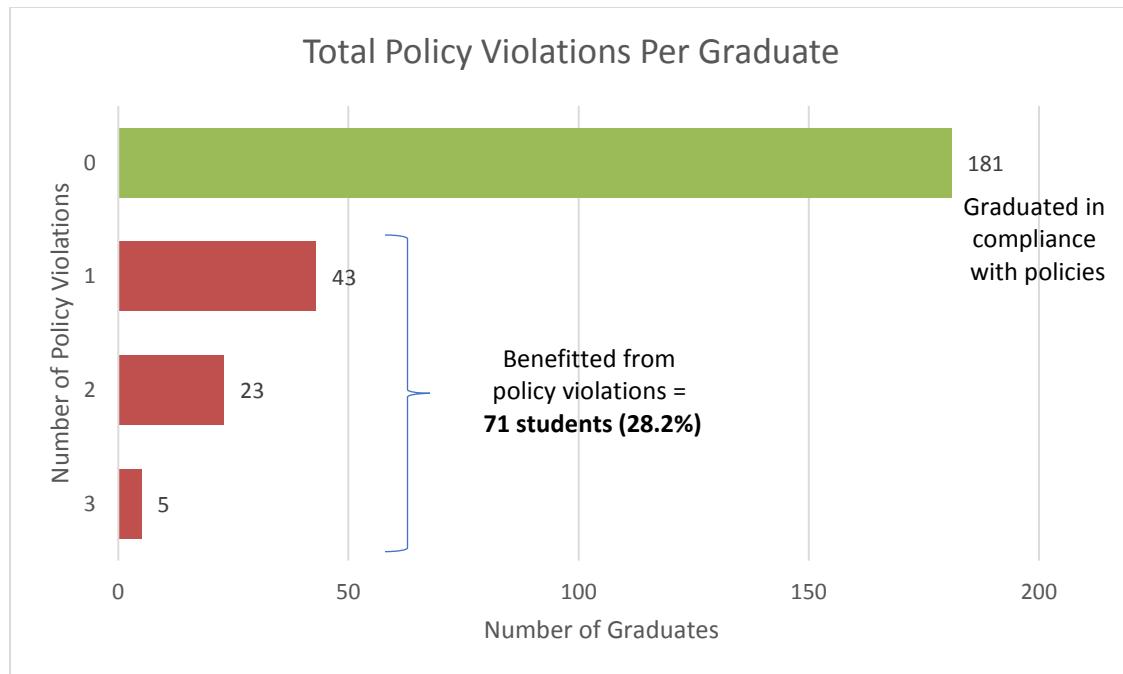


Figure 17: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	50	
Missing Required Coursework	0	0.0%

Figure 18: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> The attendance-related grading policy was not adhered to at CHEC; most interviewees understood the policy as guidance as opposed to a mandate. Though credit recovery programs were generally run appropriately, some students were taking credit recovery courses as original credit for scheduling reasons without prior approval from the Office of Academic Planning and Support.
School Culture / Pressures	<ul style="list-style-type: none"> Teachers expressed they were generally comfortable with the culture at CHEC and maintained good relationships with administrators. Multiple staff spoke of the “90% rule,” in which teachers are expected to pass 90% of their students. Teachers were effectively curving grades to reach that goal. This is evaluated in the teacher CSC rubric and linked to the school-specific graduation rate goal.

	<ul style="list-style-type: none"> Some teachers expressed a long-standing district-wide culture of passing that may not necessarily come from administrators.
School-Specific Findings	<ul style="list-style-type: none"> School administration expressed their lack of trust in the Aspen system, revealing that the system often generated false reports, including inaccurate lists of potential graduates. This forced the manual checking of all Aspen produced reports.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR, promotion rate, and in-seat attendance rate. The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> “There will be 90% passing rate in all classes” to receive a rating of either 3 or 4 in CSC 1. “The attendance rate will be 90%” to receive a rating of either a 3 or 4 in CSC 1. However, CSC 3 states that “there is no lowering of academic or behavioral expectations for any students in or outside of the classroom.” The teacher CSC rubric places administrative burden on teachers by requiring the completion of 20 home visits and 100% of parents of students in danger of failing to be contacted to receive a rating of 3 or 4 in CSC 4.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Review the credit recovery program thoroughly for adequacy and compliance with DCPS policies. Discontinue any programs not in alignment with DCPS policies.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals

COOLIDGE HIGH SCHOOL

Coolidge is a neighborhood high school. A&M conducted the on-site investigation on January 10, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 70 students reviewed, a total of 15 (21.4%) graduations were impacted by policy violations. Of the 28 students sampled, a total of 1 (3.6%) was found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Coolidge High School			
Total Number of Graduates	70		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	1	1	1.4%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	10	10	14.3%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0	0	0.0%
Credit Recovery Earned as an Original Credit	12	12	17.1%
Credit Recovery Earned Taken Concurrently with Original Credit Course	1	1	1.4%
Total Graduations Impacted by Policy Violations		15	21.4%
Total Graduations Not Impacted by Policy Violations	55	55	78.6%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 19: Consolidated Findings

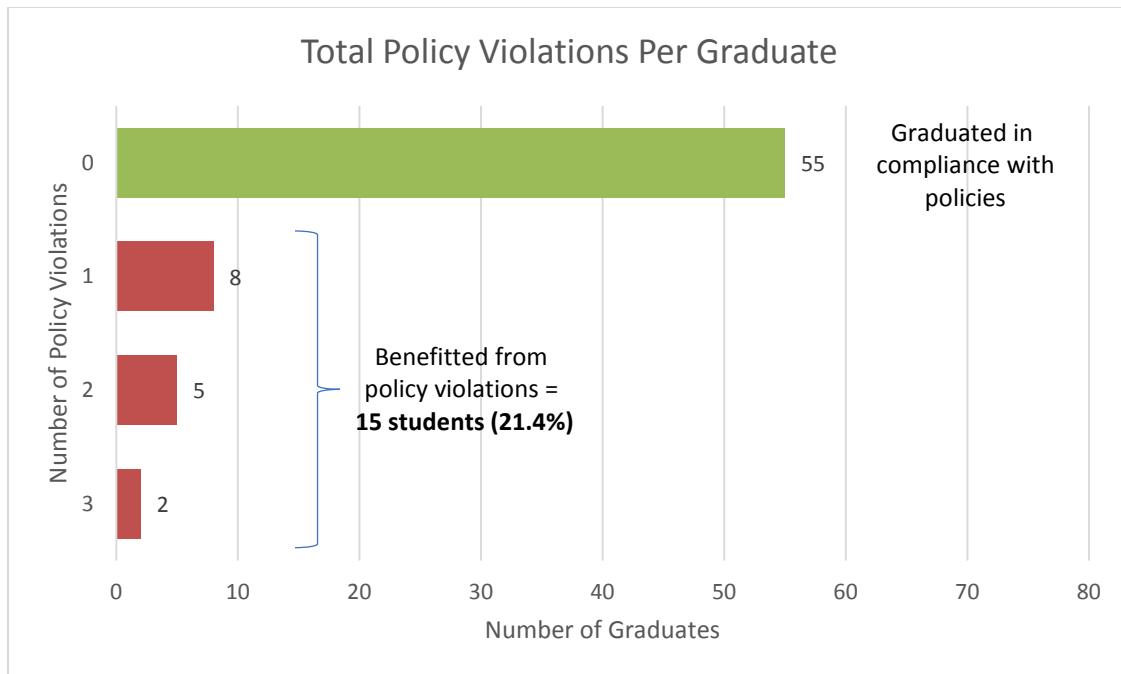


Figure 20: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	28	
Missing Required Coursework	1	3.6%

Figure 21: Samples Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Coolidge has a unit recovery program that administrators claim DCPS was aware of. However, unit recovery is not consistent with credit recovery policies; unit recovery is taken concurrently with the original credit course to make up the failing grade of a previous quarter in the span of a quarter. The school also maintains a daytime credit recovery program, which is not specifically allowed in accordance with the ECR Manual. Coolidge did not delineate between ECR and daytime credit recovery course coding. Interviewees stated that credit recovery courses taken without original credit courses was common. Certain teachers are utilizing a 50% minimum grade; teachers are unsure whether Aspen grades an F as a zero or a higher grade. This practice is not stated in policy.

	<ul style="list-style-type: none"> Teachers are not failing students solely for excessive absences; the school does not adhere to the attendance-related grading policy.
School Culture / Pressures	<ul style="list-style-type: none"> Teachers did not verbalize feeling pressure to manipulate results from school administrators or DCPS. However, teachers stated it was better to graduate students rather than to have them drop out.
School-Specific Findings	<ul style="list-style-type: none"> Staff expressed that attendance data was altered without their consent to change students' status from absent to present. Community service forms were kept in an organized separate filing system.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric does not appear to contain pressures that may encourage policy violations. However, it places administrative burden on teachers by requiring the creation of an Instructional Student Support Plan for any student who is failing to receive a rating of 3 or 4 in CSC 3 and evidence of consistent parental contact with 80% of students for CSC 4.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Review the credit recovery program thoroughly for adequacy and compliance with DCPS policies. Discontinue any programs not in alignment with DCPS policies.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.
- Further investigate allegations of altered attendance and suspension records. Assess compliance with attendance entry policies. Enhance controls for recordkeeping systems for attendance and suspension to reduce the possibility of unauthorized changes.

DUKE ELLINGTON SCHOOL OF THE ARTS

Ellington is an application high school. A&M conducted the on-site investigation on January 17, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 115 students reviewed, a total of 12 (10.4%) graduations were impacted by policy violations. Of the 30 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Duke Ellington School of the Arts			
Total Number of Graduates	115		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	7	6.1%	
Passed Despite Excessive Absences in Evening Credit Recovery Courses	3	2.6%	
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0	0.0%	
Credit Recovery Earned as an Original Credit	3	2.6%	
Credit Recovery Earned Taken Concurrently with Original Credit Course	4	3.5%	
Total Graduations Impacted by Policy Violations		12	10.4%
Total Graduations Not Impacted by Policy Violations	103	89.6%	

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 22: Consolidated Findings

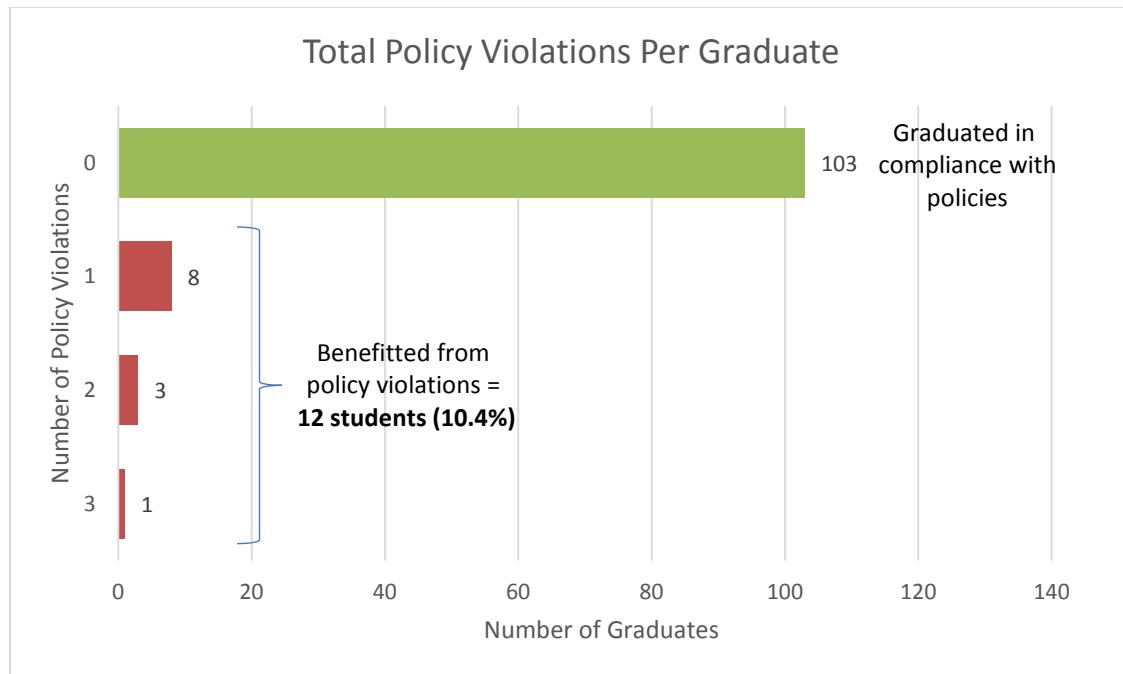


Figure 23: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	30	
Missing Required Coursework	0	0.0%

Figure 24: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> The attendance-related grading policy was not adhered to in SY16-17; teachers were mostly not aware of the policy. In previous years, some senior students in the 4th term for an original credit course had taken credit recovery at the same time.
School Culture / Pressures	<ul style="list-style-type: none"> DCPS teachers working at Duke Ellington understood the goal of 90% pass rate included in the CSC part of IMPACT to be an implied directive to teachers not to fail more than 10 percent of the class.
School-Specific Findings	<ul style="list-style-type: none"> During SY16-17, credit recovery was not offered at Duke Ellington. Duke Ellington's students attended credit recovery courses at Cardozo High School. Teachers reported that Aspen training provided by DCPS was inadequate. Instead, teachers at the school took the initiative to learn how to use the

	<p>system and trained other staff members. Moreover, the system is not user friendly.</p> <ul style="list-style-type: none"> As an arts school, students are frequently away from school for performances. In such circumstances, they are provided extra opportunities to do make-up work.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> “There will be 90% passing rate in all classes” to receive a rating of either 3 or 4 in CSC 1. However, CSC 3 states that “there is no lowering of academic or behavioral expectations for any students in or outside of the classroom.”

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

DUNBAR HIGH SCHOOL

Dunbar is a neighborhood high school. A&M conducted the on-site investigation on January 8, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 166 students reviewed, a total of 40 (24.1%) graduations were impacted by policy violations. Of the 33 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Dunbar High School			
Total Number of Graduates	166		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation		3	1.8%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	33		19.9%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	23		13.9%
Credit Recovery Earned Taken Concurrently with Original Credit Course	1		0.6%
Total Graduations Impacted by Policy Violations		40	24.1%
Total Graduations Not Impacted by Policy Violations	126		75.9%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 25: Consolidated Findings

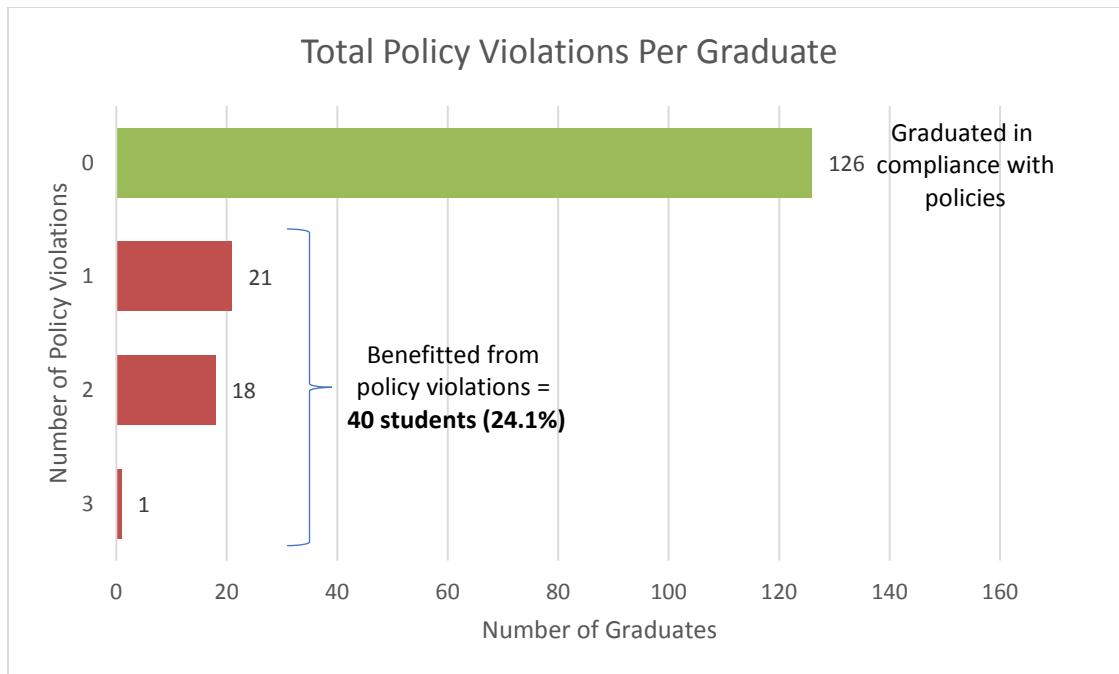


Figure 26: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	33	
Missing Required Coursework	0	0.0%

Figure 27: Sampled Graduates Missing Required Coursework

School-Specific Findings

Finding	Description
School Adherence to Policy	<ul style="list-style-type: none"> Administrators demonstrated awareness of the attendance-based grading policy. However, they acknowledged that the policies were not enforced. Teachers at Dunbar had mixed awareness of the attendance-related grading policy and reported that the actual attendance policy is not enforced. For credit recovery, the school does not adhere to the attendance policy of failing or dropping students from the course after three absences and focuses mostly on students with excessive absences. Administration and staff reported that students are often enrolled in credit recovery once it is determined that they are mathematically unable to pass a course, which deviates from the DCPS policy that students must fail the course before they are enrolled in credit recovery. Administration reported that this practice was approved by DCPS. Teachers reported that there are students who are taking multiple credit recovery courses in Twilight during the same time slot. Teachers have reported

	<p>that credit recovery also happens during actual class time for a parallel class a student is taking.</p> <ul style="list-style-type: none"> • The structure of credit recovery, both during the lunch period and in Twilight during the evening, does not allow sufficient class time to fulfill the 120-seat hour requirement. Staff indicated that they received guidance that the seat hour requirement is not as important in credit recovery courses. • Teachers have expressed concerns that student attendance records have been altered to change “absent” to “tardy.” They have also indicated that suspensions were underreported. • Administration reported that grade changes are not initiated by administrators and that there are few grade changes related to make-up work. • Teachers have reported instances of grades being changed in Aspen without their authorization.
School Culture / Pressures	<ul style="list-style-type: none"> • Teachers indicated that they are encouraged to give students every opportunity to pass a class, even if it conflicts with established policies on attendance and make-up work. • Teachers and staff indicated that school administration goals tied to graduation rates encourage “creative” scheduling and lax enforcement of policies. • Teachers have indicated that the paperwork and other expectations required to fail a student are onerous and they often face pressure to pass students with a low D. • Teachers indicated that pressures to advance students are most concentrated in the 9th and 12th grades. • Teachers reported that they are encouraged to give students make-up work even if absences are unexcused. • Many of the teachers A&M requested to speak with had left DCPS. Former staff indicated that the high level of teacher turnover is due to pressures and negative targeting.
School-Specific Findings	<ul style="list-style-type: none"> • Credit recovery generally does not start the first week of the quarter and is shortened during the fourth quarter. This reduces the possible number of seat hours. Teachers have reported that non-Dunbar credit recovery teachers often arrive to the school late for the first session of ECR. • Teachers reported that approximately one-third of students regularly attend Twilight classes. Teachers indicated that Twilight has become a “dumping ground” for students who have behavior or attendance issues during the day.
Performance Management	<ul style="list-style-type: none"> • The school goals for SY16-17 included goals for ACGR, promotion rate, and suspension rate. • The teacher CSC rubric does not appear to contain pressures that may encourage policy violations.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Review the credit recovery program thoroughly for adequacy and compliance with DCPS policies. Discontinue any programs not in alignment with DCPS policies.
- Further investigate allegations of grades being changed without teacher consent. Evaluate Aspen to ensure the proper controls are in place to ensure integrity of grading.
- Further investigate allegations of altered attendance and suspension records. Assess compliance with attendance entry policies. Enhance controls for recordkeeping systems for attendance and suspension to reduce the possibility of unauthorized changes.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

EASTERN HIGH SCHOOL

Eastern is a neighborhood high school. A&M conducted the on-site investigation on January 16, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 198 students reviewed, a total of 89 (44.9%) graduations were impacted by policy violations. Of the 40 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Eastern High School			
Total Number of Graduates	198		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	67		33.8%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	37		18.7%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	10		5.1%
Credit Recovery Earned Taken Concurrently with Original Credit Course	0		0.0%
Total Graduations Impacted by Policy Violations		89	44.9%
Total Graduations Not Impacted by Policy Violations	109		55.1%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 28: Consolidated Findings

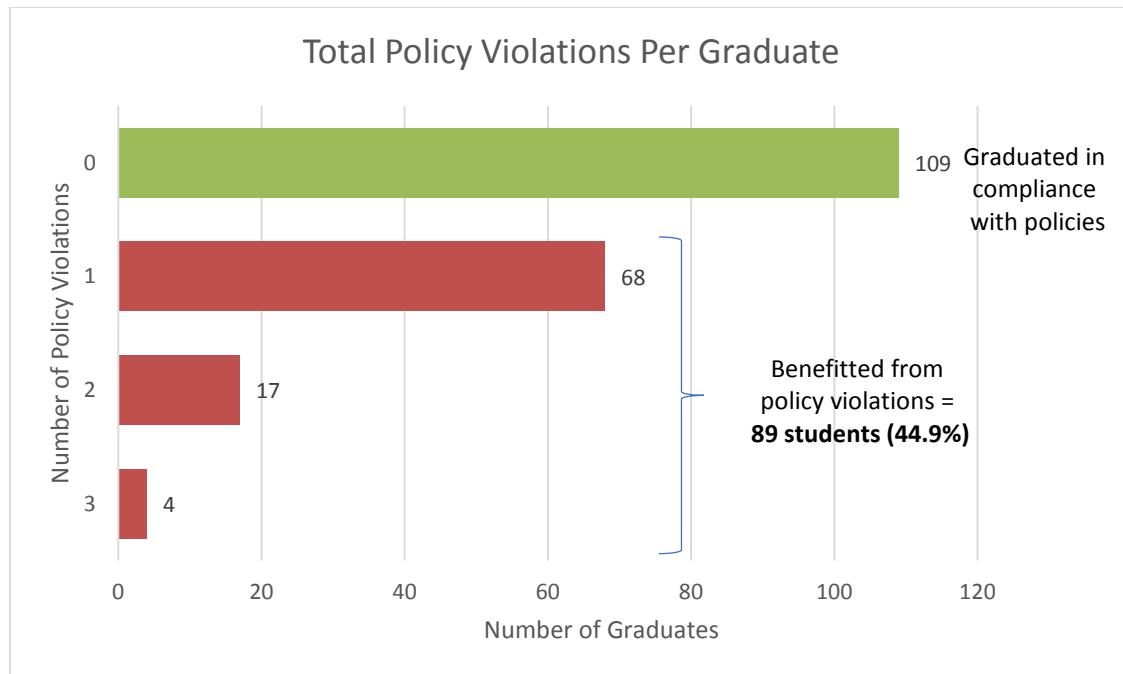


Figure 29: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	40	
Missing Required Coursework	0	0.0%

Figure 30: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Teachers indicated that the school was not adhering to the attendance-related grading policy. Teachers and others indicated that credit recovery was only available for courses which a student had previously failed. However, the attendance component of the ECR Manual was not being followed. Students who completed the work but who were chronically absent in credit recovery courses were still allowed to pass. Some teachers and administrators knew of the attendance-related grading policy, but were not actively enforcing them.
School Culture / Pressures	<ul style="list-style-type: none"> Teachers indicated that there was never any pressure from school or district leadership to increase grades or ignore absences. There was more of a focus on giving students every opportunity to pass rather than enforcing the attendance policy.

	<ul style="list-style-type: none"> • There is a long-standing culture to not give students below a 50 on assignments, but there is no official school policy and each grade level has different standards. • Administrators and teachers were concerned about the performance metrics in the IMPACT system tied to passing students, promotion rates, and graduation rates. • Teachers also indicated that the immense amount of paperwork and documentation required to fail a student may incentivize some teachers to pass students with a D instead of failing them. No teachers indicated that they themselves had ever done that, but believed that could be an incentive to not fail students.
School-Specific Findings	<ul style="list-style-type: none"> • Records were in good order and the school appeared organized.
Performance Management	<ul style="list-style-type: none"> • The school goals for SY16-17 included goals for ACGR, promotion rate, and suspension rate. • The CSC rubric for teachers at Eastern included an initiative to align daily instruction to the ACGR. • The CSC rubric also places administrative burden on teachers by requiring the creation of an Instructional Student Support Plan for any student who is failing to receive a rating of 3 or 4 in CSC 4.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

LUKE C. MOORE HIGH SCHOOL

Moore is an Opportunity Academy. A&M conducted the on-site investigation on January 18, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 116 students reviewed, a total of 101 (87.1%) graduations were impacted by policy violations. Of the 30 students sampled, a total of 4 (13.3%) were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Luke C. Moore High School			
Total Number of Graduates	116		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	39		33.6%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	84		72.4%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	84		72.4%
Credit Recovery Earned Taken Concurrently with Original Credit Course	0		0.0%
Total Graduations Impacted by Policy Violations		101	87.1%
Total Graduations Not Impacted by Policy Violations		15	12.9%
<small>*Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.</small>			
<small>Total Graduations Impacted by Policy Violations is a count of unique students.</small>			

Figure 31: Consolidated Findings

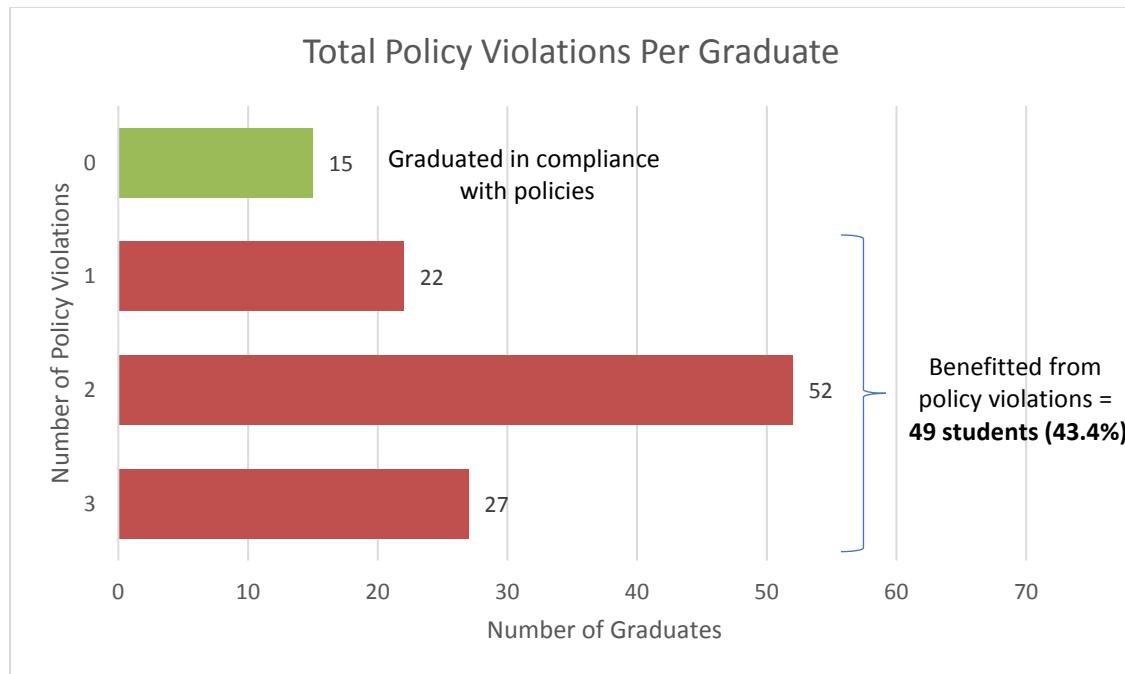


Figure 32: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	30	
Missing Required Coursework	4	13.3%

Figure 33: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Many students who start school at Moore are already over the maximum number of unexcused absences for failing a course. Once the students start at Moore, the school does not consider their previous absences, even though they are technically a part of the students' record. According to staff, the attendance-related grading policy is generally not enforced given the extenuating circumstances of the students they serve. Teachers and administrators reported that students are only enrolled in a credit recovery class if they have already failed the course. Moore does not have clear rules around attendance for credit recovery, however if a student has not attended the course within the first two weeks they are generally dropped from the course. Teachers reported mixed awareness of the attendance-related grading policy for both regular and credit recovery courses.

School Culture / Pressures	<ul style="list-style-type: none"> • Make-up work is highly encouraged. Teachers often spend additional time with students to provide explanation of the materials they've missed. There is ambiguity around the timing expectations for make-up work and students are generally given until the end of a quarter to complete make-up work. • Teachers reported they generally feel comfortable raising issues or concerns to their department chairs and the school administration. However, the use of administrators as instructional evaluators can sometimes negatively impact the teacher-administrator culture.
School-Specific Findings	<ul style="list-style-type: none"> • There is ambiguity on how the attendance policy relates to the alternative school population. Students generally come to Moore severely off-track. The administration estimates that a student arriving mid-year has already missed most of the instructional days before they start at Moore. • Given Moore's student population, attendance is an issue for all students. The school uses several interventions to try to get students to attend school. As there is a significant population over 18, it is reported that students can write their own excuse notes. Students are also able to bring in excuse notes for multiple, non-consecutive days and teachers are required to provide them with make-up work. • Students in credit recovery receive a blended instruction model that relies on teacher instruction, as well as use of the online platform. The structure of each student's course is designed based on their circumstances and ability to spend time in class. For this reason, the curriculum and rigor of credit recovery courses are designed to match regular instruction courses held during the day. • Teachers reported that they are often responsible for teaching multiple courses of credit recovery during the same time slot depending on what students need. • Credit recovery teachers are asked to develop a "no-show" list to document students who have not attended the classes. • Administration reports that grade changes are processed when a student makes up work for classes they missed based on extenuating circumstances.
Performance Management	<ul style="list-style-type: none"> • Teachers and administrators reported feeling the pressures of being evaluated on the same rubric as other DCPS high schools when students come to Moore already severely off-track. Student attendance from the previous school is counted against teacher evaluations, even if student attendance has improved while at Moore. • The school goals for SY16-17 included goals for ACGR, promotion rate, and in-seat attendance rate. • The teacher CSC rubric does not appear to contain pressures that may encourage policy violations.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.

- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Reevaluate the applicability of standard DCPS policies to alternative schools for attendance, grading, and graduation.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

McKINLEY TECHNOLOGY HIGH SCHOOL

McKinley Tech is an application high school. A&M conducted the on-site investigation on January 10, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 118 students reviewed, a total of 8 (6.8%) graduations were impacted by policy violations. Of the 30 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
McKinley Technology High School			
Total Number of Graduates	118		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	0	0	0.0%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	1	1	0.8%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0	0	0.0%
Credit Recovery Earned as an Original Credit	1	1	0.8%
Credit Recovery Earned Taken Concurrently with Original Credit Course	6	6	5.1%
Total Graduations Impacted by Policy Violations		8	6.8%
Total Graduations Not Impacted by Policy Violations	110	110	93.2%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 34: Consolidated Findings

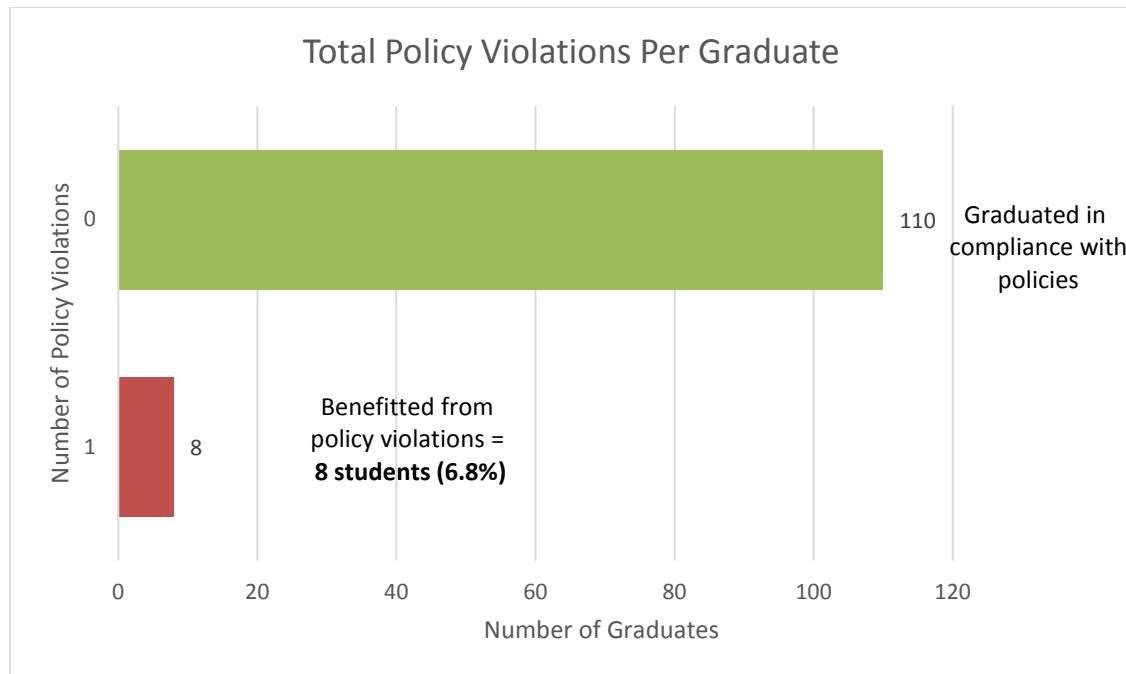


Figure 35: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	30	
Missing Required Coursework	0	0.0%

Figure 36: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> The staff at McKinley Tech generally seemed to be aware of and enforce DCPS policies. Policies are discussed and trained at staff meetings. Since McKinley Tech is an application school, the students self-select into a higher performing environment and must maintain specific GPA and attendance requirements in order to continue attending the school. Thus, attendance is not an issue at this school. Teachers and administrators reported that they do not need to enforce the attendance policies because students do not reach the unexcused absence thresholds for grade reductions. Rather than make-up work packets, teachers reported that students are encouraged to schedule time to go over concepts they have missed. Teachers, administrators, and staff reported that credit recovery is not common.

School Culture / Pressures	<ul style="list-style-type: none"> Teachers and Staff at McKinley Tech indicated that they do not feel undue pressure, particularly as it relates to grades and attendance. Teachers and Staff reported that they feel comfortable raising issues to the administration and the culture of the school is open to feedback and change based on staff and student input.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> “95% grade level in-seat attendance (ISA) rate and passing ALL core subject areas and STEM major” to receive a rating of either 3 or 4 in CSC 4. The CSC rubric also places administrative burden on teachers by requiring 100% of parents to be contacted at least once per receive a rating of 3 or 4 in CSC 4.

School-Specific Recommendations and Follow-Up

- No recommendations.

PHELPS ARCHITECTURE, CONSTRUCTION, AND ENGINEERING HIGH SCHOOL

Phelps is an application high school. A&M conducted the on-site investigation on January 11, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 86 students reviewed, a total of 8 (9.3%) graduations were impacted by policy violations. Of the 30 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Phelps ACE High School			
Total Number of Graduates	86		
		Count of Students *	% of Graduates
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation		1	1.2%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	5		5.8%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	2		2.3%
Credit Recovery Earned Taken Concurrently with Original Credit Course	0		0.0%
Total Graduations Impacted by Policy Violations		8	9.3%
Total Graduations Not Impacted by Policy Violations	78		90.7%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 37: Consolidated Findings

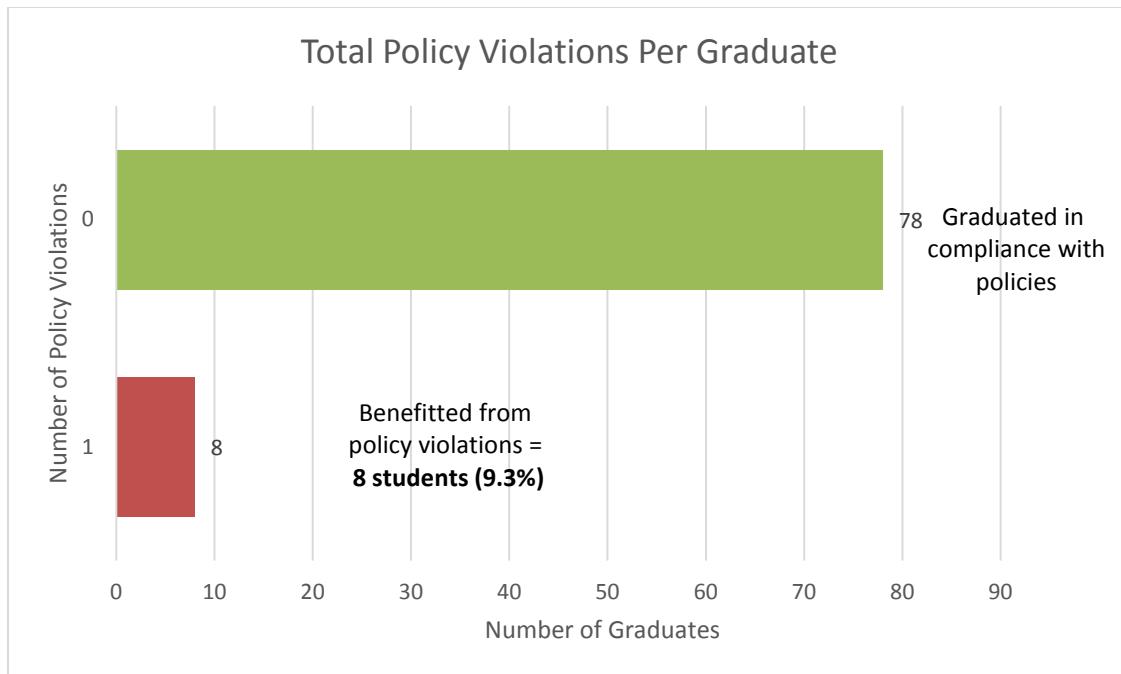


Figure 38: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	30	
Missing Required Coursework	0	0.0%

Figure 39: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Teachers and other staff indicated that students are not enrolled in credit recovery unless they have already failed a course. Teachers demonstrated awareness of the attendance-related grading policy for regular term courses. Teachers indicated that the attendance-related grading policy was adhered to by most teachers. Teachers indicated that they were not aware of absence policy in credit recovery courses. Staff reported that seniors may still pass a credit recovery course if they have missed many class sessions. Teachers indicated that enforcement of attendance policy is more on teachers than administrators. Teachers indicated that they are required to mark a student "tardy" even if they have missed the majority of class time.

School Culture / Pressures	<ul style="list-style-type: none"> Teachers and staff indicated that make-up work is given for both excused and unexcused absences. Teachers reported being pressured to provide make-up work even when they knew a student was in school but intentionally missing the class. Teachers indicated that student pass rates do not affect their IMPACT scores. Teachers and other staff reported mixed levels of comfort in raising issues or concerns to the Administration.
School-Specific Findings	<ul style="list-style-type: none"> Staff reported that as compared to other application schools, Phelps is more lenient in the “uninvite” process, in which students are asked to return to their neighborhood school for not meeting certain requirements. At Phelps, students are generally uninvited for low grades and poor behavior, but not attendance. ENGRADE was used last year as a grade book. Transition was made to Aspen this year. Students and parents find resetting passwords in Aspen difficult. This acts as a hindrance to them using the system. Teachers and staff indicated that there is not a minimum grade policy, but are unsure whether Aspen uses a minimum grade for F's.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric does not appear to contain pressures that may encourage policy violations.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

ROOSEVELT HIGH SCHOOL

Roosevelt is a neighborhood high school. A&M conducted the on-site investigation on January 10, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 113 students reviewed, a total of 49 (43.4%) graduations were impacted by policy violations. Of the 29 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Roosevelt High School			
Total Number of Graduates	113		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	19		16.8%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	33		29.2%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	29		25.7%
Credit Recovery Earned Taken Concurrently with Original Credit Course	0		0.0%
Total Graduations Impacted by Policy Violations		49	43.4%
Total Graduations Not Impacted by Policy Violations	64		56.6%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 40: Consolidated Findings

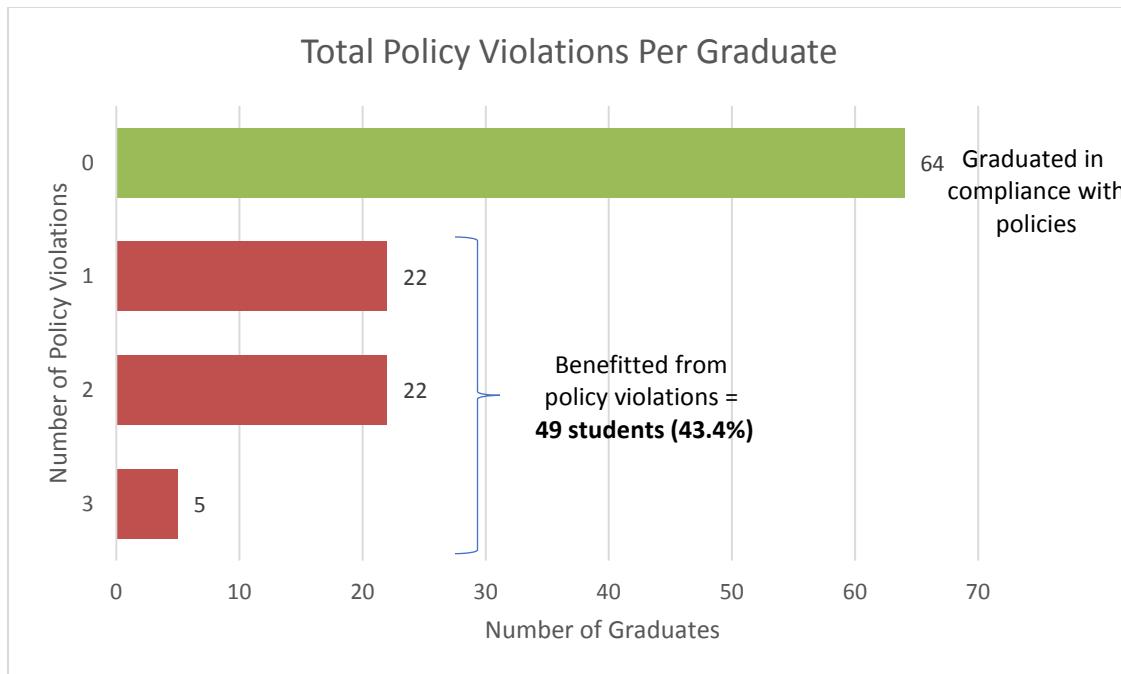


Figure 41: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	29	
Missing Required Coursework	0	0.0%

Figure 42: Sampled Graduates Missing Required Coursework

School-Specific Findings

Finding	Description
School Adherence to Policy	<ul style="list-style-type: none"> The attendance-related grading policy was not enforced prior to SY17-18. Credit recovery programs seemed generally controlled and run within guidelines, though CR attendance policies were not observed.
School Culture / Pressures	<ul style="list-style-type: none"> Multiple individuals interviewed detailed excessive administrative burden involved with failing a student. Teachers alleged that school administrators exercised intimidation paired with heavy paperwork burden in order to dissuade teachers from failing students in support of graduation rate goals. School administration was alleged to have selectively ignored the Grading Policy, emphasizing student support plan execution that would push teachers to pass students while not enforcing the attendance-related grading policy. Teachers expressed that attendance data was altered without their consent to change students' status from absent to present.

School-Specific Findings	<ul style="list-style-type: none"> The school was only able to produce roughly half of the requested cumulative folders, stating that the missing folders had been archived at an undisclosed location.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> “65-80% of students are passing your class” to receive a rating of 3 and “>80% of students are passing your class” to receive a rating of 4 on CSC 3. The teacher CSC rubric places administrative burden on teachers by requiring >80% of parents to be contacted for a rating of 3 and 100% of parents of to be contacted to receive a rating of 4 in CSC 4.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Further investigate allegations of altered attendance and suspension records. Assess compliance with attendance entry policies. Enhance controls for recordkeeping systems for attendance and suspension to reduce the possibility of unauthorized changes.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.
- Improve record retention to reduce missing student files and records.

ROOSEVELT STAY HIGH SCHOOL

Roosevelt STAY is an Opportunity Academy. A&M conducted the on-site investigation on January 17, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 98 students reviewed, a total of 60 (61.2%) graduations were impacted by policy violations. Of the 30 students sampled, a total of 2 (6.7%) were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Roosevelt STAY High School			
Total Number of Graduates	98		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	60		61.2%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	0		0.0%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	2		2.0%
Credit Recovery Earned as an Original Credit	5		5.1%
Credit Recovery Earned Taken Concurrently with Original Credit Course	1		1.0%
Total Graduations Impacted by Policy Violations		60	61.2%
Total Graduations Not Impacted by Policy Violations	38		38.8%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 43: Consolidated Findings

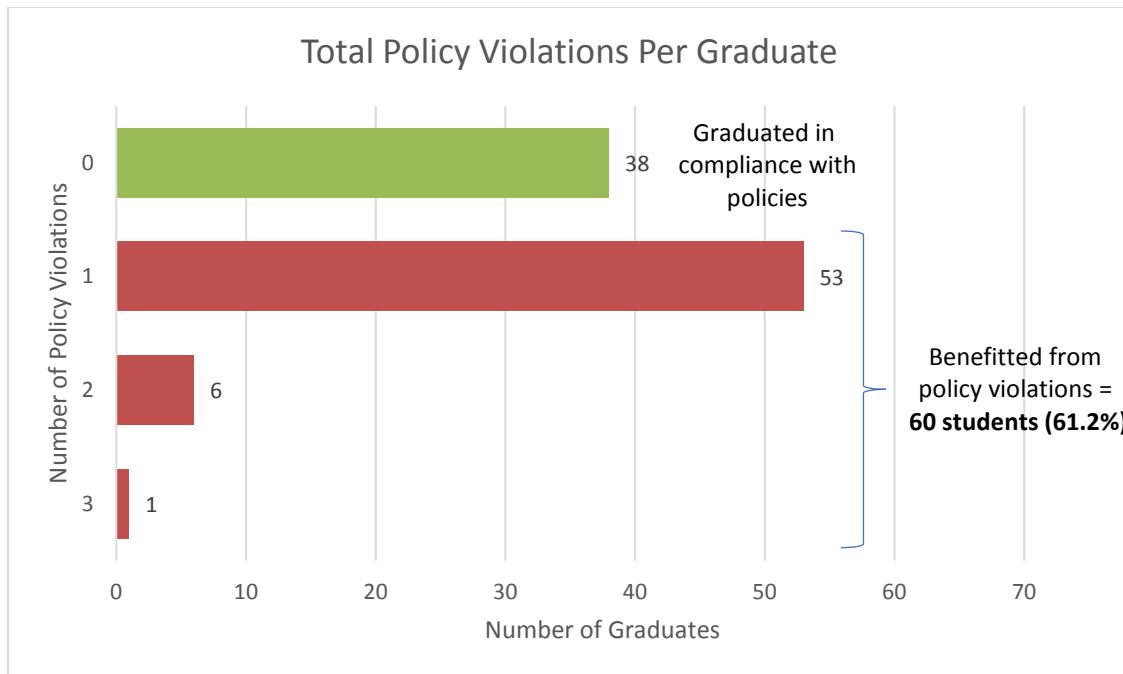


Figure 44: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	30	
Missing Required Coursework	2	6.7%

Figure 45: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Interviewees demonstrated mixed awareness of the attendance-related grading policy; however, they acknowledged that the policies were not enforced. Interviewees also noted alternative schools such as Roosevelt STAY are often the last opportunity for kids who have not done well in conventional school settings due to attendance, learning, and other issues. They expressed that to apply failing grades to students with excessive absences does not consider the unique challenges facing these students. Teachers noted that students are not failed due to poor attendance. Students are given multiple opportunities to make-up work during class, during teacher planning periods, and during lunch. Teachers noted that students are only given failing grades when they are unable to demonstrate mastery of content. Administration and teachers indicated that that many of the courses offered are blended learning (i.e. have in-person and web-based components);

	<p>therefore, students still can demonstrate mastery of the content even with many course absences.</p> <ul style="list-style-type: none"> The credit recovery program administered by the school is performed during the school day and not under the oversight of DCPS. The credit recovery courses are only offered to students after they have failed the original credit course.
School Culture / Pressures	<ul style="list-style-type: none"> Some teachers noted that there was an administrative burden to follow up with students with attendance issues and who were failing courses. That burden included many calls to student homes, home visits, the creation of student intervention plans, etc. Teachers indicated that they are encouraged to give students multiple opportunities to pass a class by demonstrating mastery of content, but none reported feeling pressure to pass students by administration.
School-Specific Findings	<ul style="list-style-type: none"> Staff indicated there is a high administrative burden to fail students.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for promotion rate and in-seat attendance rate. The teacher CSC rubric does not appear to contain pressures that may encourage policy violations.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Review the credit recovery program thoroughly for adequacy and compliance with DCPS policies. Discontinue any programs not in alignment with DCPS policies.
- Reevaluate the applicability of standard DCPS policies to alternative schools for attendance, grading, and graduation.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

SCHOOL WITHOUT WALLS HIGH SCHOOL

School Without Walls is an application high school. A&M conducted the on-site investigation on January 16, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 147 students reviewed, **none** graduations were impacted by policy violations. Of the 30 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
School Without Walls High School			
Total Number of Graduates	147		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	0	0	0.0%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	0	0	0.0%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0	0	0.0%
Credit Recovery Earned as an Original Credit	0	0	0.0%
Credit Recovery Earned Taken Concurrently with Original Credit Course	0	0	0.0%
Total Graduations Impacted by Policy Violations		0	0.0%
Total Graduations Not Impacted by Policy Violations	147	147	100.0%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 46: Consolidated Findings

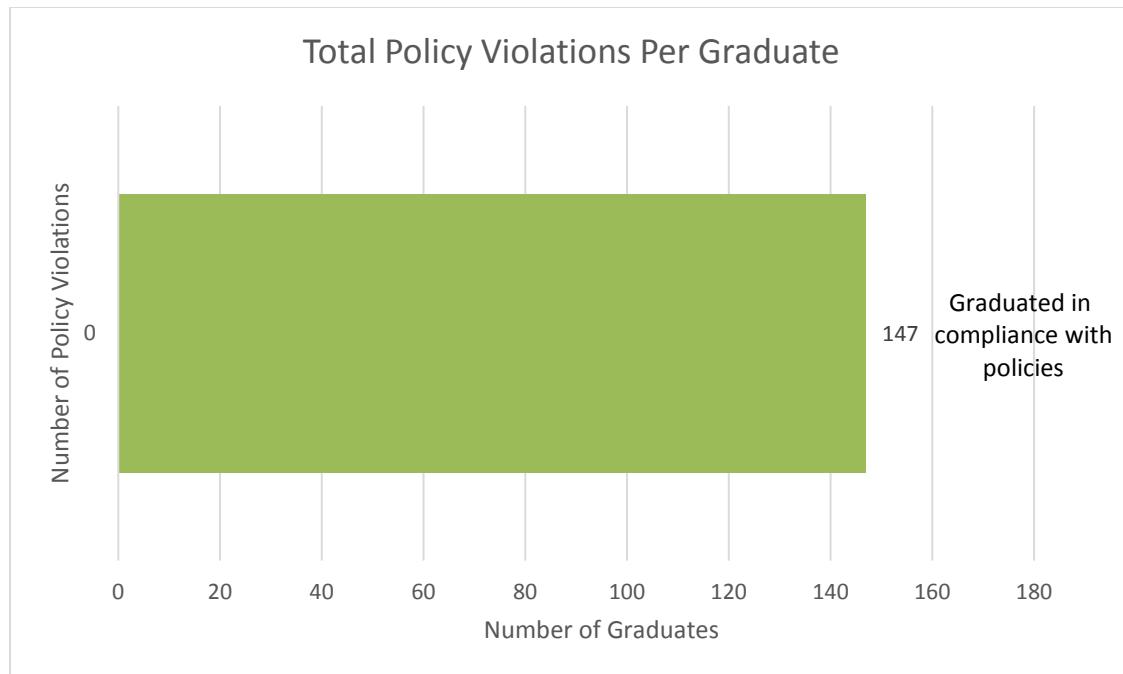


Figure 47: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	30	
Missing Required Coursework	2	6.7%

Figure 48: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Teachers are not clear on how Aspen calculates final grades, but indicated that it may use grading floors for letter grades. Teachers indicated that they do not enter a specific grading floor. Teachers indicated that unexcused absences were often changed to excused, potentially without basis. Teachers were generally aware of the attendance-related grading policy, but reported that absences generally do not reach levels that would trigger grade reductions.
School Culture / Pressures	<ul style="list-style-type: none"> Administration indicated that DCPS did not mandate the enforcement of the attendance-related grading policy.

	<ul style="list-style-type: none"> Some teachers indicated that the administrative burden related to failing students often results in teachers providing additional opportunities for students to pass.
School-Specific Findings	<ul style="list-style-type: none"> Credit recovery is not used at this school. Teachers indicated that they did not receive training on the Grading Policy and that Aspen training was insufficient.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> “Pass rates of 90% quarterly grades – an average of classes you teach (score of 4), 80% pass rate (score of 3)” on CSC 1.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Further investigate allegations of altered attendance and suspension records. Assess compliance with attendance entry policies. Enhance controls for recordkeeping systems for attendance and suspension to reduce the possibility of unauthorized changes.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

WASHINGTON METROPOLITAN HIGH SCHOOL

Washington Metro is an Opportunity Academy. A&M conducted the on-site investigation on January 17, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 53 students reviewed, a total of 30 (56.6%) graduations were impacted by policy violations. Of the 30 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Washington Metropolitan High School			
Total Number of Graduates	53		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	30		56.6%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	0		0.0%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	0		0.0%
Credit Recovery Earned Taken Concurrently with Original Credit Course	0		0.0%
Total Graduations Impacted by Policy Violations		30	56.6%
Total Graduations Not Impacted by Policy Violations	23		43.4%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 49: Consolidated Findings

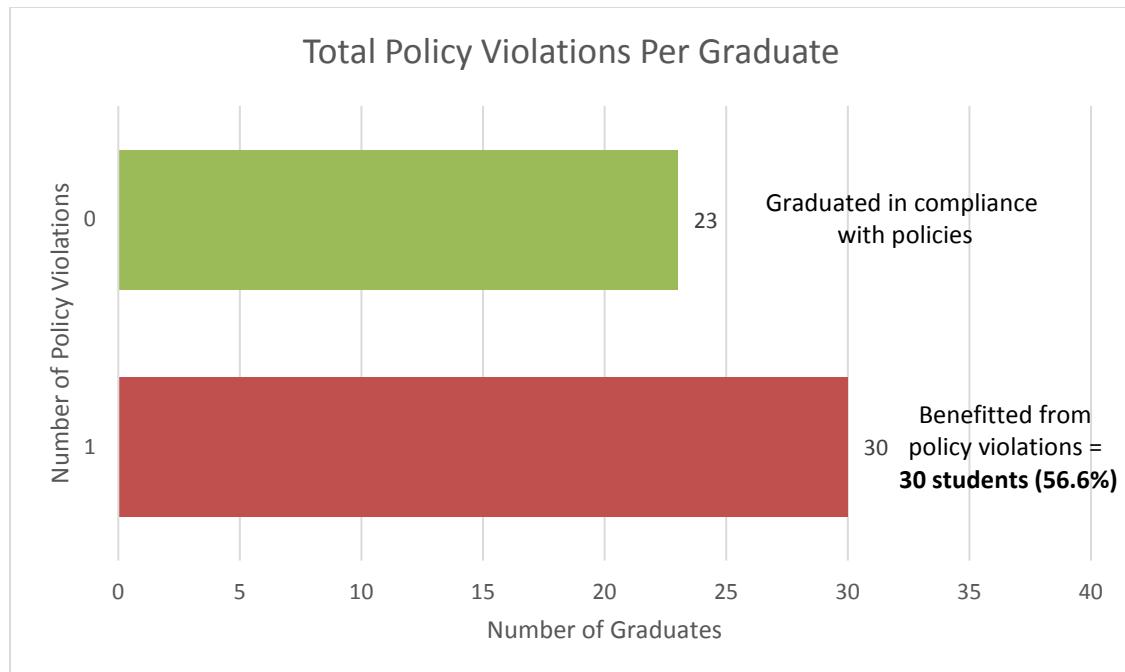


Figure 50: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	30	
Missing Required Coursework	0	0.0%

Figure 51: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Most students here are over-age and under-credited. The principal reported that the attendance rate of the school is approximately 50 percent. Students that attend Washington Metro come from other DCPS schools due to attendance, behavior, or other issues. Most students attend Washington Metro because they had truancy issues at other DCPS schools. The school does not adhere to attendance policy. An interviewee alleged that attendance counselors have the ability to enter a code like 'authorized school activity' to excuse an otherwise unexcused absence or suspension. Staff expressed there are some students who have an internship on their schedule, but are neither assigned one nor completed one; the school counselor is listed as the instructor and the students receive credit for the course. ECR programs are not widely utilized due to a lack of funds last year.

	<ul style="list-style-type: none"> Interviewees expressed that many ECR students rarely attend class, but are provided work packets to complete and given credit for the course.
School Culture / Pressures	<ul style="list-style-type: none"> Teachers did not feel pressured by administration to pass students.
School-Specific Findings	<ul style="list-style-type: none"> Washington Metro utilizes the Summit program, which is an independent study program that allows students to learn at their own pace under the supervision of classroom instructors. In addition, work may be completed from home. Administrators stated that they communicated the Grading Policy and attendance-related grading policy to staff and students. However, it is unclear how those can be adhered to given the Summit program includes independent and remote studies.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> “There will be 80% passing rate in all classes” for a rating of either 3 or 4 on CSC 1. The teacher CSC rubric places administrative burden on teachers by requiring communication bi-weekly with at least 80% of families for a rating of either 3 or 4 on CSC 4.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Review the credit recovery program thoroughly for adequacy and compliance with DCPS policies. Discontinue any programs not in alignment with DCPS policies.
- Reevaluate the applicability of standard DCPS policies to alternative schools for attendance, grading, and graduation.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

WOODROW WILSON HIGH SCHOOL

Wilson is a neighborhood high school. A&M conducted the on-site investigation on January 9, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 396 students reviewed, a total of 57 (14.4%) graduations were impacted by policy violations. Of the 79 students sampled, a total of 1 (1.3%) was found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Wilson High School			
Total Number of Graduates	396		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	31		7.8%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	18		4.5%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	25		6.3%
Credit Recovery Earned Taken Concurrently with Original Credit Course	2		0.5%
Total Graduations Impacted by Policy Violations		57	14.4%
Total Graduations Not Impacted by Policy Violations	339		85.6%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 52: Consolidated Findings

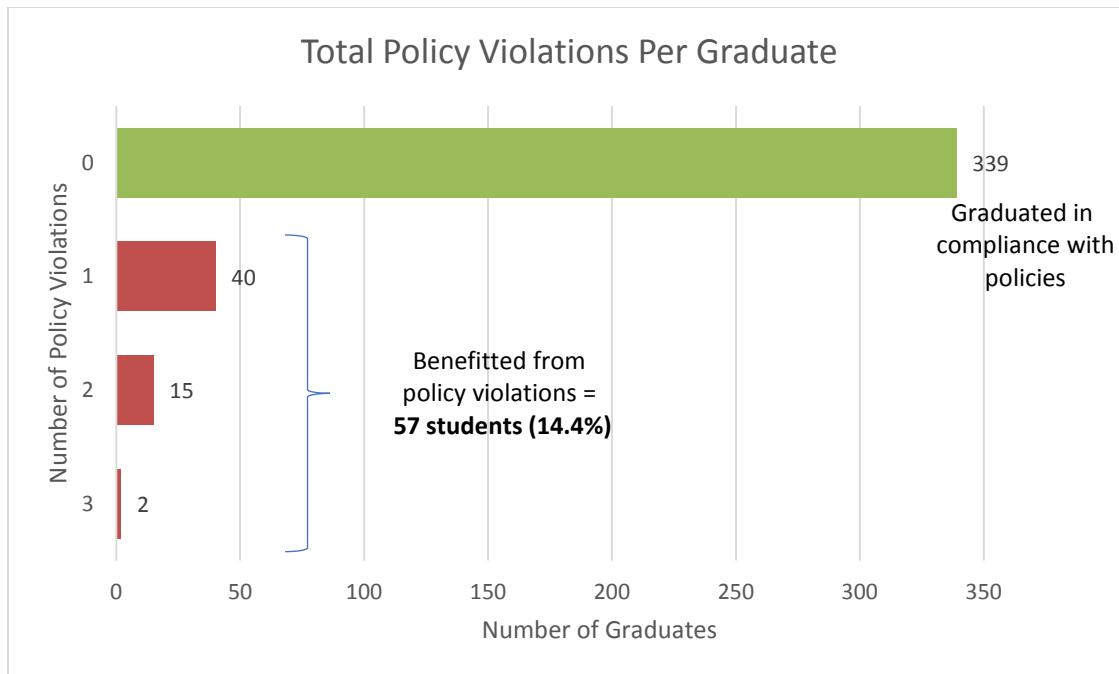


Figure 53: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	79	
Missing Required Coursework	1	1.3%

Figure 54: Sampled Students Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> Wilson has a unit recovery program that administrators claim DCPS was aware of. However, unit recovery is not consistent with credit recovery policies; unit recovery is taken concurrently with the original credit course to make up the failing grade of a previous quarter in the span of a quarter. At Wilson, unit recovery is generally performed after school but there is no in-seat requirement. Students at Wilson are allowed to take as many unit recovery courses as they choose to each quarter and complete work assigned by the teacher independently online. Teachers were given autonomy with regards to the Grading Policy. Teachers were not failing students solely for excessive absences. However, enforcement has changed for SY17-18. Administrators noted Wilson's issues are aligned more with tardiness than absenteeism.

School Culture / Pressures	<ul style="list-style-type: none"> • Principal has discouraged teachers from allowing make-up work but teachers may do so. • Teachers noted pressures regarding passing of students, specifically noting athletes, and allowing students to do make-up work. • Teachers make every option available to pass including make-up packets/work.
School-Specific Findings	<ul style="list-style-type: none"> • In contradiction to Grading Policy, the current Wilson High School student planner states that DC Board of Education grading policy includes a 50% base for “good faith effort.” • The administration claims teachers have autonomy over grading. • Staff and teachers expressed concerns regarding the amount of training they received on the Grading Policy prior to this school year. • Records were in good order and the school appeared organized.
Performance Management	<ul style="list-style-type: none"> • The school goals for SY16-17 included goals for ACGR, promotion rate, in-seat attendance rate, and suspension rate. • The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> ◦ “Has passing rate of 80% or can demonstrate use of credit recovery and/or unit recovery, and other interventions” for a rating of 3 or “ensure at least 50% of failing students in your class participate and complete Unit Recovery by the end of IMPACT cycle” for a rating of 4 on CSC 3. ◦ “The attendance rate will be 80%” for a rating of either 3 or 4 on CSC 1.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Provide comprehensive training on Aspen for teachers and administrators led by Aspen experts, including how to run all required Aspen reports.
- Review the credit recovery program thoroughly for adequacy and compliance with DCPS policies. Discontinue any programs not in alignment with DCPS policies.
- Clarify the 50% minimum grade policy is not in compliance with the Grading Policy and remove all references from official school documentation.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.

H.D. WOODSON HIGH SCHOOL

Woodson is a neighborhood high school. A&M conducted the on-site investigation on January 9, 2018. A&M reviewed student files, and conducted interviews on-site and over the phone. A&M analyzed the grade records of all 2017 graduates and conducted a transcript review for a randomly-selected sample of students from the graduating class of 2017. This summary presents record review findings, site visit observations, and key statistics from data analytics.

Findings

Of the 163 students reviewed, a total of 77 (47.2%) graduations were impacted by policy violations. Of the 34 students sampled, **none** were found to be missing coursework required for graduation. The following section summarizes the findings from A&M's data analysis.

Graduations Impacted by Policy Violations in SY16-17			
Woodson High School			
Total Number of Graduates	163		
		Count of Students *	% of Graduate s
Passed Despite Excessive Absences in Regular Instruction Courses Required for Graduation	72		44.2%
Passed Despite Excessive Absences in Evening Credit Recovery Courses	28		17.2%
Passed Despite Excessive Absences in Daytime Credit Recovery Courses	0		0.0%
Credit Recovery Earned as an Original Credit	16		9.8%
Credit Recovery Earned Taken Concurrently with Original Credit Course	0		0.0%
Total Graduations Impacted by Policy Violations		77	47.2%
Total Graduations Not Impacted by Policy Violations	86		52.8%

**Count of students is not unique. Students may have more than one policy violation, so these counts cannot be summed.
Total Graduations Impacted by Policy Violations is a count of unique students.*

Figure 55: Consolidated Findings

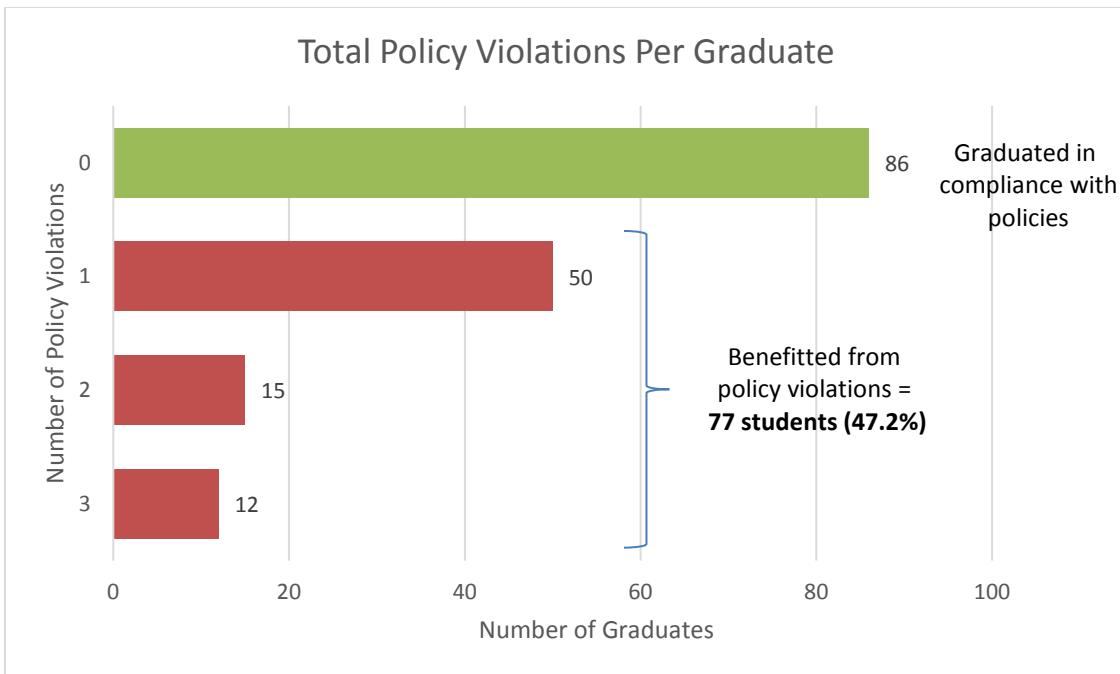


Figure 56: Total Policy Violations Per Graduate

Sampled Graduates Missing Required Coursework	Count of Students	% of Sample
Total Number of Graduates Sampled	34	
Missing Required Coursework	0	0.0%

Figure 57: Sampled Graduates Missing Required Coursework

School-Specific Findings and Observations

Findings	Description
School Adherence to Policy	<ul style="list-style-type: none"> The attendance-related grading policy was viewed as optional at this school, with teachers expressing that they were viewed to have autonomy regarding its application. Staff also expressed that student challenges made policy application difficult. Woodson has a unit recovery program that administrators claim was approved by DCPS. However, unit recovery is not consistent with credit recovery policies; unit recovery is taken concurrently with the original credit course to make up the failing grade of a previous quarter in the span of a quarter. The program as applied at the school appeared well thought-out and operated.
School Culture / Pressures	<ul style="list-style-type: none"> Teachers expressed that school administration did not actively apply pressure to increase grades or ignore absences.

	<ul style="list-style-type: none"> Teachers stated that deviations from DCPS policies were influenced by institutional expectations (IMPACT goals) to increase graduation rates and by empathy for student circumstances.
School-Specific Findings	<ul style="list-style-type: none"> Administration expressed confidence in the policies that they had implemented. Interviewees expressed that Central Office had been very hands-off in changing or enforcing the Grading Policy or DCMR.
Performance Management	<ul style="list-style-type: none"> The school goals for SY16-17 included goals for ACGR and promotion rate. The teacher CSC rubric may create pressure on teachers by stating: <ul style="list-style-type: none"> “80% passing rate in all classes” for a rating of either 3 or 4 on CSC 1. “The attendance rate will be 80%” for a rating of either 3 or 4 on CSC 1. The teacher CSC rubric places administrative burden on teachers by requiring “at least 70% of parents attend parent conference nights or the teacher holds phone conferences with 90% of students in all classes” for a rating of either 3 or 4 on CSC 4.

School-Specific Recommendations and Follow-Up

- Train teachers and support staff on DCMR and Grading Policy and credit recovery policy requirements. Provide tools to support compliance.
- Evaluate performance goals for school leaders and teachers to ensure appropriate emphasis is placed on DCPS policy compliance relative to passing, promotion, and graduation goals.
- Review the credit recovery program thoroughly for adequacy and compliance with DCPS policies. Discontinue any programs not in alignment with DCPS policies.

APPENDIX B: PERFORMANCE MANAGEMENT REVIEW

IMPACT is the DCPS effectiveness assessment system for school-based personnel used to provide feedback, drive professional development, and evaluate staff. Throughout interviews with DCPS high schools staff, many people reported feeling pressures associated to IMPACT. A&M reviewed the SY16-17 IMPACT guidelines for teachers and principals to review these claims.

Teachers

General education teachers are evaluated on five components, as summarized in the table below. Each component, and each element of individual components, is scored on a rating of 4.0 (highest) to 1.0 (lowest), except for Core Professionalism, which is used to deduct points from the final IMPACT score for any rating below Meets Standard.

Teacher IMPACT Components	Teachers with IVA	Teachers w/o IVA
Student Achievement Data		
Individual Value-Added Student Achievement Data (IVA)	35%	
Teacher-Assessed Student Achievement Data (TAS)	15%	15%
Essential Practices (EP)	30%	65%
Student Surveys of Practice (SSP)	10%	10%
Commitment to the School Community (CSC)	10%	10%
Core Professionalism (CP)	Point deductions for below Meets Standard	

A brief description of each IMPACT component follows:

- **Student Achievement Data** – measures the impact teachers have on students' learning over the course of the school year.
 - **Individual Value-Added Student Achievement Data (IVA)** – uses “before” and “after” PARCC scores for English Language Arts (ELA) and math teachers in grades four through ten. DCPS calculates how a teacher’s students are likely to perform on average using the previous year’s scores and other relevant information and compares this to actual results.
 - **Teacher-Assessed Student Achievement Data (TAS)** – uses scores on rigorous assessments other than the PARCC that are aligned to the DCPS content standards and approved by the school administration. At least 1.5 years of growth is needed for a Level 4 rating and less than one year of growth results in a Level 1 rating.
- **Essential Practices (EP)** – measures instructional expertise based on unannounced class evaluations conducted by administrators.
- **Student Surveys of Practice (SSP)** – measures instructional culture through research-based student surveys conducted once a year.
- **Commitment to the School Community (CSC)** – measures the extent to which teachers support and collaborate with the school community through five aspects. Teachers are assessed twice during the year by administrators and their scores for each element are averaged to produce a

component score. While the elements are established by DCPS, specific initiatives and supports evaluated are chosen by individual schools.

- CSC 1: Support of the Local School Initiatives
- CSC 2: Support Special Education and ELL Programs
- CSC 3: Efforts to Promote High Academic and Behavioral Expectations
- CSC 4: Partnership with Students' Families
- CSC 5: Instructional Collaboration with Colleagues
- **Core Professionalism (CP)** – measures four basic professional requirements for all school-based personnel twice each school year.

Once an overall score for each component is calculated, the scores are multiplied by the above percentages for a total score between 100 and 400. This is then adjusted for the Core Professionalism rating through point deductions, giving the final score. The score is rated on the IMPACT scale below:

OVERALL IMPACT SCALE				
INEFFECTIVE	MINIMALLY EFFECTIVE	DEVELOPING	EFFECTIVE	HIGHLY EFFECTIVE
100 Points	200 Points*	250 Points**	300 Points†	350 Points‡

* A score of exactly 200 would be classified as Minimally Effective.
 ** A score of exactly 250 would be classified as Developing.
 † A score of exactly 300 would be classified as Effective.
 ‡ A score of exactly 350 would be classified as Highly Effective.

Teachers who receive a rating below Effective will be held at their current salary step and have limited time to improve, or be subject to separation. Teachers who receive a rating of Effective or Highly Effective can expect progression on their pay scales. Those at the Advanced, Distinguished, and Expert LIFT (Leadership Initiative for Teachers) career ladder stages will earn larger base salary increases.

Teachers who are members of the Washington Teachers' Union (WTU) and earn a rating of Highly Effective are eligible for an annual bonus between \$3,000 and \$25,000. Teachers who accept the bonus or salary increase will no longer have access to the "extra year," early retirement, or buyout options if they are excessed at any time in the future and cannot find a placement at another school.

Teacher IMPACT by School

While DCPS IMPACT guidelines include a rubric for each component detailing what each element looks like at each rating level, the CSC rubric outlines five general standards from which individual schools develop rubrics based on unique school context. The DCPS IMPACT team does not approve these rubrics for content, but rather reviews them for completion.

A&M reviewed CSC rubrics for each school and found that several school rubrics include factors that may have impacted teacher adherence to policy. **Four schools evaluate whether a teacher's students meet a certain level of attendance. Ten schools evaluate the percentage of students who pass the teacher's**

courses. This produces an incentive for teachers to not fail their students. The table below shows a summary of these findings.

Further, schools may evaluate teachers on the number of home visits conducted, successful contact with students' parents, and creating Individual Support Plans for all failing students. The pressures associated with these administrative burdens is further discussed in the Culture of Passing section.

School IMPACT CSC Rubrics	Uses attendance criteria	Uses passing criteria
Anacostia		
Ballou	X	X
Ballou STAY		
Banneker		
Cardozo		X
Columbia Heights	X	X
Coolidge		
Dunbar		
Eastern		
Duke Ellington		X
Luke C. Moore		
McKinley Tech	X	X
Phelps ACE		
Roosevelt		X
Roosevelt STAY		
School Without Walls		X
Washington Met		X
Wilson		X
Woodson	X	X
Total	4	10

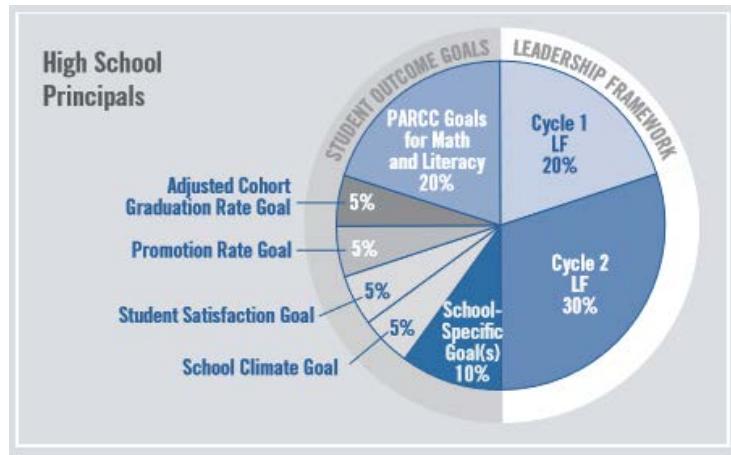
Figure 1: School IMPACT CSC Rubrics for Teachers

Factors that may discourage policy adherence affect less than 10% of teachers' IMPACT scores. However, teachers reported receiving deductions through the Core Professionalism rating for not adhering to administration policies that are in violation of DCPS policies.

A&M did not analyze sensitive personnel information for this investigation.

Principals

Principals are evaluated on two main categories, each worth 50% of their IMPACT score: Student Outcome Goals and Leadership Framework Standards, as summarized below in the IMPACT guidelines.



Like the teacher CSC rubrics, A&M found that certain components of the principal rubric may have impacted teacher adherence to policy. Other factors may be unattainable based on school context. Factors that may affect principal adherence to policy are italicized below in the component descriptions.

Student Outcome Goals (50%) – School leaders complete a needs assessment with their staff and then set goals based on the previous year's challenges and root causes. Principals meet with their instructional superintendent and the deputy chief and/or chief of schools to finalize their goals.

- **PARCC Goals (20%)** – measures achievement over the course of the year on the annual PARCC exam in math and ELA. All principals have four standardized PARCC goals, each weighted at 5%, focused on increasing student proficiency and reducing the number students at the lowest levels.
- ***An adjusted cohort graduation rate (ACGR) goal (5%)***
- ***A promotion rate goal (5%)***
- **School climate goal(s) (10%)** – At least 5% must be a goal set around the student satisfaction index. Principals can select another school climate goal or increase the weight of the student satisfaction index goal to 10%.
- **School-specific goals (10%)** – Principals may set one goal weighted at 10% or two goals weighted at 5%, using metrics from the bank in the guidelines, including:
 - Additional ELA and math measures in addition to PARCC
 - Academic metrics around *ACGR, promotion rate, or AP/SAT scores*
 - School culture metrics around *student attendance, suspensions, or truancy*

Leadership Framework Assessments (LF) (50%) – measures the effectiveness of leadership practices on improving student learning for six key standards through qualitative and quantitative measures. Principals are evaluated during two separate assessment cycles, the first worth 20% and the second worth 30% of their IMPACT score.

- **Instruction (25%)** – Establishes a shared vision and goals for student achievement and uses a deep knowledge of curriculum, instruction, and assessment to achieve the school's vision and goals.
- **Talent (15%)** – Attracts, selects, develops, and retains key talent to maximize staff members' performance and student learning.

- **School Culture (15%)** – Creates and sustains a strong school culture that supports an effective learning environment.
- **Operations (15%)** – Ensures efficient school operations and resource management to maximize student learning.
- **Family and Community (15%)** – Exercises effective management of families and community members to ensure their meaningful involvement in student learning and school success.
- **Personal Leadership (15%)** – Demonstrates reflective, solution-oriented, culturally proficient, and resilient leadership.

Leadership Framework On-Track Indicators (Quantitative Measures)		
Instruction	Talent	School Culture
<ul style="list-style-type: none"> • <i>Number of students on track to promote</i> • <i>Course specific pass rate</i> • <i>Number of students enrolled in honors and advanced placement courses</i> • Number of seniors who submitted a college application 	<ul style="list-style-type: none"> • Teacher attendance rate • Same day attendance entry • Highly Effective and Effective teacher retention rate 	<ul style="list-style-type: none"> • <i>In-seat attendance</i> • <i>Student tardiness</i> • <i>Truancy rate</i> • <i>Suspension rate</i> • <i>After-school program attendance</i>
Operations	Family & Community	Personal Leadership
<ul style="list-style-type: none"> • Percentage of students with residency verified • Projected enrollment reached 	<ul style="list-style-type: none"> • Number of home visits • Number of phone calls home for students with absences 	<ul style="list-style-type: none"> • N/A

Once an overall score for each component is calculated, the scores are multiplied by the above percentages for a total score between 100 and 400, which is rated on the IMPACT scale as shown below:



From the student outcome goals, 10% of the IMPACT score, and up to an additional 10% depending on the school-specific goals, may be affected by pressures related to attendance, promotion, and graduation. Instruction and School Culture, which make up 40% of the LF component, or 20% of the total IMPACT score, could also be impacted by these pressures. **Thus, up to 40% of the total IMPACT score for principals could be affected by pressures that may affect adherence to policy.**

All assistant principals share the student outcome goals set by their principal that aligns with their content area(s) of focus or aligned to school-wide work, including PARCC, school climate, graduation, and promotion goals. AP-specific goals will replace any school-specific goals that are not applicable to them.

Any school leader who earns an IMPACT rating of Highly Effective is eligible for an annual bonus. Principals may receive up to \$30,000 and assistant principals may receive up to \$15,000. Among DCPS principals, the only ones who received Highly Effective ratings were at schools that did not have issues related to attendance, grading, and graduation. Thus, A&M's review does not indicate that DCPS principals are maliciously manipulating their evaluations for monetary compensation.